

**EXHIBIT 34**

Monique Russell

1                   IN THE UNITED STATES DISTRICT COURT  
2                   FOR THE EASTERN DISTRICT OF PENNSYLVANIA  
3  
4   - - - - - X  
5   MONIQUE RUSSELL, JASMINE                   :  
6   RIGGINS, ELSA M. POWELL                   :  
7   and DESIRE EVANS,                         : Civil Action No.  
8                                   Plaintiffs,                   : 18-5629  
9   v.   :  
10   EDUCATIONAL COMMISSION FOR               :  
11   FOREIGN MEDICAL GRADUATES,               :  
12                                   Defendant.                   :

13   - - - - - X

14  
15               Videotaped Deposition Of MONIQUE RUSSELL  
16                                   Washington, D.C.  
17                                   Monday, September 16, 2019  
18                                   1:51 p.m.

19  
20  
21   Job No. 88394  
22   Pages: 1 - 136  
23   Reported by: Dana C. Ryan, RPR, CRR, CSR (GA)

24  
25



Monique Russell

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12	12 Facebook Messenger Messaging
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2	2 EXHIBITS CONTINUED
3 ON BEHALF OF THE PLAINTIFFS:	3 (Attached to the Transcript)
4 CORY L. ZAJDEL, Esquire	4 RUSSELL DEPOSITION PAGE:
5 Z Law, LLC	5 Exhibit 4 Medical Records From Major 91
6 2345 York Road, #B-13	6 Medical, LLC, For Monique
7 Timonium, Maryland 21093	7 Russell, Bates Stamped
8 Telephone: (443) 213-1977	8 Plaintiffs0000118654 Through
9 Email: clz@zlawmaryland.com	9 0000118679
10	10 Exhibit 5 June 27, 2017 Facebook Post 105
11 ON BEHALF OF THE DEFENDANT:	11 By Monique Russell To The
12 BARRY W. SHAFFER, Esquire	12 MaMa Sisterhood Of Prince
13 MATTHEW D. KLAYMAN, Esquire	13 George's County Facebook
14 Morgan, Lewis & Bockius, LLP	14 Group
15 1701 Market Street	15 Exhibit 6 Stipulation Of Dismissal 113
16 Philadelphia, Pennsylvania 19103	16 Without Prejudice, Bates
17 Telephone: (215) 963-5100	17 Stamped Plaintiffs0000118860
18 Email: barry.shaffer@morganlewis.com	18 Through 0000118863
19 Email: matthew.klayman@morganlewis.com	19 Exhibit 7 Plaintiff Monique Russell's 116
20	20 Responses To Defendants'
21 Also present:	21 Requests For Admission
22 David Campbell, Videographer	22
23	23
24	24
25	25

<p style="text-align: right;">Page 6</p> <p>1 PROCEEDINGS</p> <p>2 THE VIDEOGRAPHER: We are now on the</p> <p>3 record. My name is David Campbell, and I am a</p> <p>4 videographer for Golkow Litigation Services.</p> <p>5 Today's date is September 16th, 2019, and the time</p> <p>6 is 1:51 p.m. This deposition is being held at</p> <p>7 1111 Pennsylvania Avenue, Northwest, Washington,</p> <p>8 D.C. 20004.</p> <p>9 This is in the matter of Monique</p> <p>10 Russell, et al., versus Educational Commission for</p> <p>11 Foreign Medical Graduates. This is in the United</p> <p>12 States District Court for the Eastern District of</p> <p>13 Pennsylvania, number 18-5629.</p> <p>14 The deponent is Monique Russell. The</p> <p>15 court reporter is Dana Ryan.</p> <p>16 Counsel, will you please identify</p> <p>17 yourselves for the record, and then the court</p> <p>18 reporter will please swear in the witness and we</p> <p>19 can proceed.</p> <p>20 MR. ZAJDEL: Cory Zajdel on behalf of</p> <p>21 the plaintiff.</p> <p>22 MR. SHAFFER: Brian Shaffer on behalf</p> <p>23 of the Educational Commission for Foreign Medical</p> <p>24 Graduates.</p> <p>25 MR. KLAYMAN: And Matthew Klayman for</p>	<p style="text-align: right;">Page 8</p> <p>1 The oath that you just took from the</p> <p>2 court reporter is the same one that you would take</p> <p>3 in a court of law before a judge and a jury.</p> <p>4 Do you understand that?</p> <p>5 A Yes, I do.</p> <p>6 Q And the court reporter sitted to my --</p> <p>7 seated to my left is taking down my questions and</p> <p>8 your answers into a little booklet that will be</p> <p>9 transcribed, and you'll have the opportunity to</p> <p>10 review after we complete the deposition today.</p> <p>11 Do you understand that?</p> <p>12 A Yes.</p> <p>13 Q And, so, because she's going to be</p> <p>14 taking down the questions and the answers, it's</p> <p>15 important that we try not to talk over top of each</p> <p>16 other because she can't take us both down at the</p> <p>17 same time.</p> <p>18 I'll try to do that on my part. Will</p> <p>19 you -- will you do the same?</p> <p>20 A Yes.</p> <p>21 Q We also have a videographer here who's</p> <p>22 taking the deposition on video so that we'll be</p> <p>23 able to see the questions and answers as well.</p> <p>24 But even so, the court reporter -- it's hard for</p> <p>25 her to take down nonverbal responses. So a shake</p>
<p style="text-align: right;">Page 7</p> <p>1 the defendant the Educational Commission for</p> <p>2 Foreign Medical Graduates.</p> <p>3 EXAMINATION BY COUNSEL FOR THE DEFENDANT</p> <p>4 BY MR. SHAFFER:</p> <p>5 Q Good afternoon, Ms. Russell.</p> <p>6 A Good afternoon.</p> <p>7 Q We met briefly before we started here</p> <p>8 today. My name is Brian Shaffer, and I'm a lawyer</p> <p>9 represent -- representing the Educational</p> <p>10 Commission for Foreign Medical Graduates,</p> <p>11 sometimes known at ECFMG. We're here to take your</p> <p>12 deposition in connection with a lawsuit that you</p> <p>13 have filed against ECFMG.</p> <p>14 Will you understand that that's who I'm</p> <p>15 referring to if I use those initials?</p> <p>16 A Yes, I do.</p> <p>17 Q Great.</p> <p>18 Have you had your deposition taken</p> <p>19 before?</p> <p>20 A I don't think so.</p> <p>21 Q Okay. I'll give you a few basic ground</p> <p>22 rules --</p> <p>23 A Okay.</p> <p>24 Q -- to hopefully make this go as</p> <p>25 smoothly as possible here today.</p>	<p style="text-align: right;">Page 9</p> <p>1 of the head, we might be able to see it on the</p> <p>2 video, but it might not be clear on the</p> <p>3 transcript. And, so, if I ask you for an audible</p> <p>4 response or if I repeat your answer to make sure</p> <p>5 that I heard it correctly, that's why I'm doing</p> <p>6 it, so that the court reporter can take down the</p> <p>7 questions and answers as best she can.</p> <p>8 Is that understood?</p> <p>9 A Yes.</p> <p>10 Q This is not an endurance contest. If</p> <p>11 you need to take a break at any point in time, use</p> <p>12 the facilities, talk to your counsel, that's fine.</p> <p>13 Just let me know and we'll -- we'll go ahead and</p> <p>14 do that, okay?</p> <p>15 A Okay.</p> <p>16 Q There may be questions that I have to</p> <p>17 ask you today that relate to subjects of a</p> <p>18 personal nature, and I'm not trying to pry or do</p> <p>19 anything other than get facts that I need to have</p> <p>20 to understand the basis for the lawsuit, and</p> <p>21 that's why I'm asking those questions, okay?</p> <p>22 A Okay.</p> <p>23 Q If at any time you don't understand my</p> <p>24 question or didn't hear my question and want me to</p> <p>25 repeat it or rephrase it, just let me know, and</p>

<p style="text-align: right;">Page 10</p> <p>1 either the court reporter will read it back to you  2 or I'll try again to do a better job of asking my  3 question, okay?  4 A Okay.  5 Q Are you on any medication today that  6 would affect your ability to remember things or to  7 testify truthfully?  8 A No.  9 Q Okay. As you sit here today, can you  10 think of any reason why you couldn't testify  11 truthfully and answer questions to the best of  12 your ability?  13 A No.  14 Q Okay. Do you have any questions for me  15 before we start?  16 A Not at this time.  17 Q Okay. Can you give me your full name,  18 please?  19 A Sure. My name is Monique Melissa  20 Russell.  21 Q Okay. And your date of birth?  22 A July 16th, 1977.  23 Q And what's your current address?  24 A In the States, it is 1906 Beeches Glory  25 Path, Annapolis, Maryland 21401, but I am</p>	<p style="text-align: right;">Page 12</p> <p>1 meetings.  2 Q And when you say the two schools, there  3 are two separate schools in Costa Rica?  4 A No, they call them schools. Country  5 Day School is a campus that goes from early  6 childhood to high school, and so there are four  7 schools, the early childhood, elementary, middle  8 and high school, and I work with the two lower  9 schools.  10 Q And are you in Costa Rica by yourself,  11 or is your family with you?  12 A My family is with me.  13 Q And who is that that's with you there?  14 A My husband and my son.  15 Q Okay. And your husband's name is?  16 A Christopher William Russell.  17 Q Okay. And how old is he?  18 A He is -- how old am I? -- 46.  19 Q And your son?  20 A Is Luka.  21 Q Okay. And how old is Luka?  22 A Three.  23 Q Okay. And was Luka born or May 25th,  24 2016?  25 A Yes.</p>
<p style="text-align: right;">Page 11</p> <p>1 currently residing in Costa Rica on a two-year  2 contract.  3 Q Okay. And when did you start your time  4 in Costa Rica?  5 A On August of last year.  6 Q So August of 2018?  7 A Yes.  8 Q And when are you scheduled to return  9 completely from the two-year contract? August of  10 '20?  11 A I'm in the second year of my two-year  12 contract.  13 Q And who is the contract with?  14 A Country Day School.  15 Q And what job are you doing in Costa  16 Rica for them?  17 A I'm the curriculum coordinator for the  18 early childhood and elementary schools.  19 Q And what is your responsibilities in  20 that job?  21 A I work with the principals of both  22 schools on alignment of curriculum from  23 prekindergarten to fifth grade, and provide  24 training and professional development to all of  25 the teachers and work with them in planning</p>	<p style="text-align: right;">Page 13</p> <p>1 Q Okay. Do you have any other children?  2 A No.  3 Q And how long have you been married?  4 A For five years in October.  5 Q Okay. And you are here in Washington,  6 D.C. today having returned from Costa Rica;  7 correct?  8 A Yes, I flew from Costa Rica.  9 Q Okay. And when did you arrive here in  10 Washington?  11 A Last night.  12 Q Okay. And what, if anything, have you  13 done to prepare to come and testify here today in  14 this deposition?  15 A I reviewed my interrogatories and the  16 paperwork of the course --  17 Q Uh-huh.  18 A -- of the case, but that's about it.  19 Q Okay. You -- you have filed, as I  20 understand it, two different lawsuits related to  21 your interactions with a Dr. Charles Akoda;  22 correct?  23 A Yes.  24 Q Did you review materials related to  25 both of those cases before coming in to testify</p>

<p style="text-align: right;">Page 14</p> <p>1 today, or just the case against ECFMG?</p> <p>2 A Just this case.</p> <p>3 Q Okay. And did you talk with your</p> <p>4 counsel to prepare for the deposition today?</p> <p>5 A Yes.</p> <p>6 Q When did you do that?</p> <p>7 A At lunch.</p> <p>8 Q Today before coming in; correct?</p> <p>9 A Yes.</p> <p>10 Q And that's Mr. -- it's Cory sitting</p> <p>11 next to me; correct?</p> <p>12 A Yes.</p> <p>13 Q Did you speak with any other lawyers to</p> <p>14 prepare for your deposition today?</p> <p>15 A No. I did email with another lawyer</p> <p>16 from the team.</p> <p>17 Q Okay. Did that lawyer provide you any</p> <p>18 documents to review or information to review?</p> <p>19 MR. ZAJDEL: Objection. That would be</p> <p>20 attorney-client privilege.</p> <p>21 BY MR. SHAFFER:</p> <p>22 Q Did you review any documents that were</p> <p>23 provided to you by your attorneys before coming in</p> <p>24 to testify today?</p> <p>25 A The same interrogatories that I</p>	<p style="text-align: right;">Page 16</p> <p>1 A Yes.</p> <p>2 Q Okay. Let's mark this and just make</p> <p>3 sure we understand what it is.</p> <p>4 (Russell Deposition Exhibit 1 was</p> <p>5 marked for identification and attached to the</p> <p>6 transcript.)</p> <p>7 BY MR. SHAFFER:</p> <p>8 Q I'm going to hand this to you. This is</p> <p>9 a printout of some screenshots, I believe, from</p> <p>10 your phone or your computer; is --</p> <p>11 A Yes.</p> <p>12 Q -- that right?</p> <p>13 A Yes.</p> <p>14 Q And -- well, why don't you tell me in</p> <p>15 more detail what it is since you -- since you</p> <p>16 collected it?</p> <p>17 A Sure. These are -- this is the only</p> <p>18 conversation that I have had with Jasmine Riggins</p> <p>19 aside from saying hello to each other in the lobby</p> <p>20 this morning.</p> <p>21 Q Okay. Ms. Riggins testified on</p> <p>22 Thursday of last week that she believed she had</p> <p>23 conversations or communications with you a month</p> <p>24 or so ago.</p> <p>25 Is that consistent with your</p>
<p style="text-align: right;">Page 15</p> <p>1 mentioned earlier.</p> <p>2 Q Okay. Apart from reviewing the</p> <p>3 interrogatories, did you do any other research or</p> <p>4 review any other materials before coming in to</p> <p>5 testify today?</p> <p>6 A No. I'm not sure what . . .</p> <p>7 Q Like googling Dr. Akoda --</p> <p>8 A No.</p> <p>9 Q -- or Googling ECFMG or Googling</p> <p>10 Dimensions Health Care or anything like that.</p> <p>11 A No, I did not.</p> <p>12 Q Okay. You also provided, I think, to</p> <p>13 your lawyers some screenshots of some</p> <p>14 communications you had with a Jasmine Riggins?</p> <p>15 A Yes, I did.</p> <p>16 Q Okay. And when did you -- when did you</p> <p>17 provide those?</p> <p>18 A Are you referencing the screenshot</p> <p>19 that's in front of you?</p> <p>20 Q (Indicated affirmative.)</p> <p>21 A I believe yesterday or the day before.</p> <p>22 Q Okay. And somehow you became aware</p> <p>23 that we were asking if there were communications</p> <p>24 between you and Ms. Riggins related to any of the</p> <p>25 allegations regarding Dr. Akoda?</p>	<p style="text-align: right;">Page 17</p> <p>1 recollection?</p> <p>2 A I don't remember having any</p> <p>3 conversations with her a month ago.</p> <p>4 Q Okay.</p> <p>5 A And if I did, then I would think they'd</p> <p>6 be in this same conversation thread.</p> <p>7 Q Okay. What kind of thread is the</p> <p>8 document that's Russell 1 in front of you? Is</p> <p>9 this an app?</p> <p>10 A This is from Facebook Messenger.</p> <p>11 Q And I understand from your lawyer that</p> <p>12 there may be some materials on your Facebook page</p> <p>13 that relate to Dr. Akoda; is that correct?</p> <p>14 A Not on my Facebook page.</p> <p>15 Q Okay. A posting of some kind by you</p> <p>16 that relates to Dr. Russell -- or Dr. Akoda,</p> <p>17 sorry?</p> <p>18 A I posted about Akoda in a mommy group</p> <p>19 on Facebook.</p> <p>20 Q Okay. And there is -- what's a mommy</p> <p>21 group?</p> <p>22 A A mommy group is a, like, community of</p> <p>23 mothers that talk about mom things, like --</p> <p>24 Q Uh-huh.</p> <p>25 A -- so . . .</p>

<p style="text-align: right;">Page 18</p> <p>1 Q And so you posted something on -- on</p> <p>2 Facebook in this group and -- about Dr. Akoda, and</p> <p>3 there have been comments or messages by people</p> <p>4 left with respect to this --</p> <p>5 A Yes.</p> <p>6 Q -- posting?</p> <p>7 A Yes.</p> <p>8 Q And that's what you provided to your</p> <p>9 counsel?</p> <p>10 A Yes.</p> <p>11 Q Okay. And I understand that we're</p> <p>12 trying to get a copy of it in here so we can ask</p> <p>13 you about it.</p> <p>14 Apart from that posting in the mommy</p> <p>15 group on Facebook and this (indicating) string</p> <p>16 with Jasmine Riggins, have you had communications</p> <p>17 in writing with anyone other than your lawyers</p> <p>18 about Dr. Akoda?</p> <p>19 A Only from people who responded to the</p> <p>20 post in the mommy group.</p> <p>21 Q Okay. Would you have had similar</p> <p>22 Messenger communications like the one that's</p> <p>23 marked Russell 1 with other women besides</p> <p>24 Ms. Riggins?</p> <p>25 A With one other woman.</p>	<p style="text-align: right;">Page 20</p> <p>1 Q Let's take a quick look at what's been</p> <p>2 marked as Russell 1. And I apologize, it's</p> <p>3 oversized, but sometimes when you print</p> <p>4 screenshots, they get big; and my eyesight is bad</p> <p>5 anyway.</p> <p>6 So does this look to be a complete</p> <p>7 exchange between you and Ms. Riggins related to</p> <p>8 Dr. Akoda?</p> <p>9 A Yes.</p> <p>10 Q Okay. Did you have any phone calls</p> <p>11 with Ms. Riggins either as a follow-up to this</p> <p>12 exchange or otherwise?</p> <p>13 A I don't believe so.</p> <p>14 Q And it looks like the time period here</p> <p>15 for this exchange is July 3rd to July 13th of</p> <p>16 2017.</p> <p>17 A Yes, it does look like that.</p> <p>18 Q And, so, again to just make sure I'm</p> <p>19 understanding your testimony, since July 13th of</p> <p>20 2017 until this morning, you'd not had any</p> <p>21 communications, interactions, emails,</p> <p>22 messengering, commenting with Ms. Riggins?</p> <p>23 A Not that I know of. This is the only</p> <p>24 way that I would know to communicate with her.</p> <p>25 Q Okay. In your communication with</p>
<p style="text-align: right;">Page 19</p> <p>1 Q Okay. And who is that?</p> <p>2 A I don't know if this is her actual</p> <p>3 name --</p> <p>4 Q Uh-huh.</p> <p>5 A -- but it was Amber -- I think Amber</p> <p>6 Loftin.</p> <p>7 Q And do you still have that</p> <p>8 communication?</p> <p>9 A It would be in my inbox -- or in my</p> <p>10 messages.</p> <p>11 Q Is that something that you could</p> <p>12 provide to your counsel if we requested it and</p> <p>13 your counsel agreed to request it from you?</p> <p>14 A Yes.</p> <p>15 MR. SHAFFER: Counsel, we'll make a</p> <p>16 request if the person with whom she's referencing</p> <p>17 is a putative class member, we'll make a request</p> <p>18 for production of that communication.</p> <p>19 MR. ZAJDEL: Yeah. Sure. Do you know</p> <p>20 how to spell the name that you said?</p> <p>21 THE WITNESS: I believe it would be</p> <p>22 L-O-F-T-I-N.</p> <p>23 MR. ZAJDEL: Okay. We'll take a look</p> <p>24 for it.</p> <p>25 BY MR. SHAFFER:</p>	<p style="text-align: right;">Page 21</p> <p>1 Ms. Riggins, you notified her, among other things,</p> <p>2 that you were going to be filing a class action</p> <p>3 lawsuit against Dimensions Health Care.</p> <p>4 Do you see that?</p> <p>5 A Yes.</p> <p>6 Q And you noted that you have a very</p> <p>7 experienced and successful class action lawyer.</p> <p>8 Do you see that?</p> <p>9 A Yes.</p> <p>10 Q Who were you referring to there?</p> <p>11 A I was referring to my counsel, Cory</p> <p>12 Zajdel.</p> <p>13 Q Okay. And how did you become aware of</p> <p>14 Cory?</p> <p>15 A A friend referred me to him.</p> <p>16 Q Okay. And did you ever have</p> <p>17 communications with Ms. Riggins at her Yahoo email</p> <p>18 address that's referenced on the fourth page of</p> <p>19 your screenshot?</p> <p>20 A No, I did not.</p> <p>21 Q Let me ask a couple more background</p> <p>22 questions. So in Costa Rica, is Lukao in school?</p> <p>23 A Yes, he is.</p> <p>24 Q Okay.</p> <p>25 A Luka.</p>



<p style="text-align: right;">Page 22</p> <p>1 Q Luka with an A?</p> <p>2 A Yes.</p> <p>3 Q Okay. I apologize for that.</p> <p>4 Who takes care of him when he's not in</p> <p>5 school?</p> <p>6 A His father.</p> <p>7 Q Okay. And is your father -- is your</p> <p>8 husband working outside of taking care of Luka?</p> <p>9 A He returns to the States to work</p> <p>10 periodically.</p> <p>11 Q Okay. What does he do?</p> <p>12 A He's a musician and a deejay.</p> <p>13 Q Okay. Does he go by a name that I</p> <p>14 would know?</p> <p>15 A Ty Hussell.</p> <p>16 Q Ty Hussell, I'll have to look that one</p> <p>17 up.</p> <p>18 Do you have help with child care in</p> <p>19 Costa Rica when your husband is traveling for</p> <p>20 work?</p> <p>21 A Yes.</p> <p>22 Q Who do you use for that?</p> <p>23 A I use either a friend who is also a</p> <p>24 teacher --</p> <p>25 Q Uh-huh.</p>	<p style="text-align: right;">Page 24</p> <p>1 Q And what kinds of things do you like to</p> <p>2 do on the weekends?</p> <p>3 A Walk, go to parks.</p> <p>4 Q And where in -- I should have asked</p> <p>5 this earlier. Where in Costa Rica do you -- is</p> <p>6 the school and where do you live?</p> <p>7 A We're located just outside of San Jose.</p> <p>8 Q Is that one of the larger cities in</p> <p>9 Costa Rica?</p> <p>10 A Yes, it's the capital.</p> <p>11 Q Okay. And your position is a two-year</p> <p>12 contract, you said?</p> <p>13 A My position is a one-year contract.</p> <p>14 Q Okay.</p> <p>15 A I'm in the middle of a two-year</p> <p>16 contract. I was hired as a teacher and promoted.</p> <p>17 Q Great.</p> <p>18 And how did you find out about this</p> <p>19 opportunity?</p> <p>20 A Through a job fair.</p> <p>21 Q Okay. And approximately when did you</p> <p>22 apply to or -- or learn about this opportunity?</p> <p>23 A I went to the job fair in February of</p> <p>24 2018.</p> <p>25 Q Okay. And were you working at that</p>
<p style="text-align: right;">Page 23</p> <p>1 A -- or the assistant teachers in the</p> <p>2 early childhood program.</p> <p>3 Q And how many hours a week do they</p> <p>4 typically help you with Luka?</p> <p>5 A Maybe once a month for a couple of</p> <p>6 hours.</p> <p>7 Q Otherwise, you and your husband are</p> <p>8 able to -- to manage coverage?</p> <p>9 A Yes.</p> <p>10 Q What is your typical day like down</p> <p>11 there?</p> <p>12 A I typically get up at -- pretty early</p> <p>13 and walk and do some yoga before I go to work. We</p> <p>14 all get ready. Luka attends the school that I</p> <p>15 teach at now -- or that I work at.</p> <p>16 Q Uh-huh.</p> <p>17 A I'm not a teacher anymore. And I go to</p> <p>18 work from 7:30 to 4:30. Luka gets out at 3:00 so</p> <p>19 his father picks him up, and then they hang out</p> <p>20 and do something until I get off. And then we go</p> <p>21 home and make dinner and maybe take a walk.</p> <p>22 Q Okay. And how much sleep do you</p> <p>23 usually get per night?</p> <p>24 A It depends. Say, typically, six to</p> <p>25 seven hours.</p>	<p style="text-align: right;">Page 25</p> <p>1 time?</p> <p>2 A Yes.</p> <p>3 Q And where were you working then?</p> <p>4 A For D.C. Public Schools.</p> <p>5 Q And what was your position?</p> <p>6 A Instructional specialist.</p> <p>7 Q And was there a particular school that</p> <p>8 you were assigned to?</p> <p>9 A No, I worked for the department -- for</p> <p>10 the division of early childhood, and I was</p> <p>11 assigned anywhere from three to nine schools at a</p> <p>12 time.</p> <p>13 Q And how long did you work for the D.C.</p> <p>14 Public Schools?</p> <p>15 A For nine years.</p> <p>16 Q And did you have the same position the</p> <p>17 entire time?</p> <p>18 A No, for six years I was a classroom</p> <p>19 teacher, and for the last three I was an</p> <p>20 instructional specialist.</p> <p>21 Q What -- what grades did you teach when</p> <p>22 you were a teacher?</p> <p>23 A Prekindergarten.</p> <p>24 Q And is that mandatory in the District?</p> <p>25 A No.</p>



<p style="text-align: right;">Page 26</p> <p>1 Q Okay. So this was an optional --</p> <p>2 A Encouraged.</p> <p>3 Q Correct. Strongly encouraged; right?</p> <p>4 Did you have to resign from the D.C.</p> <p>5 Public Schools to take this position in Costa</p> <p>6 Rica?</p> <p>7 A Yes.</p> <p>8 Q Okay. And when did you do that?</p> <p>9 A Probably in -- in the spring. I don't</p> <p>10 know exactly what day.</p> <p>11 Q Spring of 2018?</p> <p>12 A Yes.</p> <p>13 Q And my understanding of the claims that</p> <p>14 you're making in the case against ECFMG is that</p> <p>15 you are not seeking any economic damages, loss of</p> <p>16 wages, loss of revenue from jobs or anything like</p> <p>17 that; is that correct?</p> <p>18 A That is correct.</p> <p>19 Q Okay. So then I don't need to ask you</p> <p>20 how much you make and all that kind of thing if</p> <p>21 you're not going to be saying that you have lost</p> <p>22 money related to any of the allegations that</p> <p>23 you're making.</p> <p>24 Do you understand that?</p> <p>25 A Yes.</p>	<p style="text-align: right;">Page 28</p> <p>1 master's?</p> <p>2 A That's terrible. I don't -- when did I</p> <p>3 get married? It was the same year. 2015 -- '14.</p> <p>4 2014.</p> <p>5 Q Okay. That would be five years ago</p> <p>6 which is I think what you --</p> <p>7 A Yes.</p> <p>8 Q -- said earlier, so you were correct</p> <p>9 then.</p> <p>10 A I should be better at math as a</p> <p>11 teacher.</p> <p>12 Q What was your subjects that you would</p> <p>13 teach? I guess if it was early education, did it</p> <p>14 cover a lot of different topics?</p> <p>15 A Everything.</p> <p>16 Q And the school that you're at now, is</p> <p>17 it an English-speaking or bilingual or Spanish?</p> <p>18 A It is -- it's an English-speaking</p> <p>19 school.</p> <p>20 Q And is it a private school --</p> <p>21 A Yes.</p> <p>22 Q -- that people pay to go to in Costa</p> <p>23 Rica?</p> <p>24 A Yes.</p> <p>25 Q Okay. And before you moved to Costa</p>
<p style="text-align: right;">Page 27</p> <p>1 Q Okay. Can you give me a little bit of</p> <p>2 your educational background?</p> <p>3 A Sure. I studied art education at the</p> <p>4 University of Maryland, and then got a teacher</p> <p>5 certification in early childhood education through</p> <p>6 the Center for Inspired Teaching. And then did a</p> <p>7 master's in teaching at Trinity Washington</p> <p>8 University.</p> <p>9 Q When did you graduate from University</p> <p>10 of Maryland?</p> <p>11 A 2009.</p> <p>12 Q And when did you get your teacher</p> <p>13 certification?</p> <p>14 A 2009.</p> <p>15 Q Was that contemporaneous with your</p> <p>16 graduation or -- or afterwards?</p> <p>17 A No, it happened afterwards.</p> <p>18 Q Okay. How long did it take you to get</p> <p>19 the certification?</p> <p>20 A I don't know. You get a -- like a</p> <p>21 temporary certification first, and then I was</p> <p>22 involved in a certification program, so when you</p> <p>23 finish it, then you get a different type of</p> <p>24 certification.</p> <p>25 Q Okay. And then when did you get your</p>	<p style="text-align: right;">Page 29</p> <p>1 Rica, you lived here in Washington, D.C.?</p> <p>2 A Yes, and in Maryland.</p> <p>3 Q Okay. Where did you live in Maryland?</p> <p>4 A In Cheverly, Maryland.</p> <p>5 Q And where is that?</p> <p>6 A It's just over the D.C. line, over the</p> <p>7 northeast section of the D.C. line.</p> <p>8 Q Okay. And did you live -- did you move</p> <p>9 to -- well, strike that.</p> <p>10 Where did you live after you graduated</p> <p>11 from University of Maryland and started working?</p> <p>12 A When I graduated from the University of</p> <p>13 Maryland, I first lived in Takoma Park and then</p> <p>14 moved into D.C., I believe in the same school</p> <p>15 year.</p> <p>16 Q And did you go to work immediately upon</p> <p>17 graduation to the D.C. Public Schools?</p> <p>18 A Yes.</p> <p>19 Q And did you work in the summertimes?</p> <p>20 Is the D.C. public school calendar one that goes</p> <p>21 through the summer, or did you do something</p> <p>22 different in the summers?</p> <p>23 A When I was an instructional specialist,</p> <p>24 I worked year round.</p> <p>25 Q Okay. How about when you were a</p>

<p style="text-align: right;">Page 30</p> <p>1 teacher?</p> <p>2 A When I was a classroom teacher, I</p> <p>3 worked ten months. I did not work summers.</p> <p>4 Q Okay. And what did you do during the</p> <p>5 summers?</p> <p>6 A Some summers I would work; I would wait</p> <p>7 tables.</p> <p>8 Q Uh-huh.</p> <p>9 A Or -- I'm trying to think what other --</p> <p>10 but jobs like that. One summer I traveled.</p> <p>11 Q Okay. Recuperated and got ready for</p> <p>12 the next school year?</p> <p>13 A Yes.</p> <p>14 Q I don't blame you.</p> <p>15 I want to talk a little bit about --</p> <p>16 what do I want to talk about? Strike that.</p> <p>17 Let me ask you some background</p> <p>18 questions about the lawsuit so I understand</p> <p>19 what -- what you know and what you're familiar</p> <p>20 with.</p> <p>21 When did you first decide to retain</p> <p>22 Mr. Zajdel as your -- as your counsel?</p> <p>23 A I don't know exactly what month, but it</p> <p>24 was probably more than a month after I found out</p> <p>25 about Akoda.</p>	<p style="text-align: right;">Page 32</p> <p>1 And I went to his Web site to confirm</p> <p>2 the spelling of his name, and he wasn't on their</p> <p>3 Web site anymore. So I went and looked at my</p> <p>4 paperwork, confirmed the spelling, I looked him up</p> <p>5 to see like, maybe he moved somewhere else so that</p> <p>6 wouldn't be an issue for this person. And I</p> <p>7 discovered a press release from the Department of</p> <p>8 Justice saying that he had been arrested for</p> <p>9 charges of fraud very shortly after he performed a</p> <p>10 C-section on me.</p> <p>11 Q And the physician that you mentioned,</p> <p>12 Dr. Waldrop?</p> <p>13 A Waldrop.</p> <p>14 Q Waldrop. That was your OB/GYN?</p> <p>15 A Yes.</p> <p>16 Q How long -- when did you first start</p> <p>17 going to see Dr. Waldrop?</p> <p>18 A I'm not sure. Maybe three months into</p> <p>19 my pregnancy.</p> <p>20 Q And how did you come to start visiting</p> <p>21 Dr. Waldrop?</p> <p>22 A She was recommended by a woman that I</p> <p>23 met on the hospital tour.</p> <p>24 Q Okay. And what hospital was that?</p> <p>25 A P.G. County, Dimensions Hospital.</p>
<p style="text-align: right;">Page 31</p> <p>1 Q And if I understand from your discovery</p> <p>2 responses in the case, you believe that you found</p> <p>3 out about the fact that Dr. Akoda, who I believe</p> <p>4 helped deliver your son, Luka, you found out he</p> <p>5 had pled guilty in June of 2017?</p> <p>6 A I'm not sure if that's the time, but if</p> <p>7 that's what your record shows, probably.</p> <p>8 Q We can go through, and we probably will</p> <p>9 go through, some of the questions. I'm not trying</p> <p>10 to -- to trick you on that, so . . .</p> <p>11 Why don't you tell me just generally</p> <p>12 how you came to learn about any issues with</p> <p>13 Dr. Akoda?</p> <p>14 A Sure. So I -- in the neighborhood</p> <p>15 where I lived at the time, there was a parent</p> <p>16 listserv where people would post recommendations</p> <p>17 or ask for advice and things like that. And</p> <p>18 someone asked for a recommendation for an OB/GYN.</p> <p>19 And I wanted to recommend my OB/GYN, Dr. Waldrop,</p> <p>20 but I wanted to make sure that the person knew if</p> <p>21 they went to Dr. Waldrop that there was a chance</p> <p>22 that they would end up having their baby delivered</p> <p>23 with Akoda, and I did not have a good experience</p> <p>24 with him during the delivery, and so I wanted to</p> <p>25 make sure the person was aware of that.</p>	<p style="text-align: right;">Page 33</p> <p>1 Q And did you have a OB/GYN before</p> <p>2 Dr. Waldrop?</p> <p>3 A I had a -- I saw a high-risk</p> <p>4 specialist, but I didn't have a regular OB/GYN.</p> <p>5 Q Okay. And what was the name of the</p> <p>6 high-risk specialist?</p> <p>7 A I don't remember. I didn't see that</p> <p>8 doctor for the most of my pregnancy.</p> <p>9 Dr. Footer, I think.</p> <p>10 Q F-O-O-T-E-R?</p> <p>11 A Yes. But there are two Dr. Footers.</p> <p>12 Q Okay.</p> <p>13 A The older Dr. Footer.</p> <p>14 Q And that was -- and, again, I'm not</p> <p>15 trying to be overly personal on this. I'm just</p> <p>16 trying to get the information.</p> <p>17 Were you at high risk because of your</p> <p>18 age or because of other conditions?</p> <p>19 A Yes, primarily because of my age, and I</p> <p>20 had bleeding at the beginning of my pregnancy, and</p> <p>21 so they wanted to monitor that.</p> <p>22 Q And, so, who was it that -- if anyone,</p> <p>23 that directed you to Dr. Footer as the high-risk</p> <p>24 specialist?</p> <p>25 A A coworker.</p>

<p style="text-align: right;">Page 34</p> <p>1 Q Okay. So this was someone at the D.C. 2 Public Schools who said here's someone to -- to go 3 see as a high-risk specialist? 4 A Yes. 5 Q Okay. And I think you were saying that 6 you didn't see Dr. Footer for all that long during 7 your pregnancy, but within about the first three 8 months, you had decided to go see Dr. Waldrop? 9 A Yes. 10 Q And how did you come to see 11 Dr. Waldrop? That was a recommendation on the 12 hospital tour? 13 A Yes, from another -- another woman in 14 the tour was asking a lot of the same questions 15 that I would be asking, and so she seemed to want 16 the same things in her birth, and I asked her who 17 she -- who her doctor was, and she recommended 18 Dr. Waldrop. 19 Q Okay. I saw references in your 20 discovery responses to a Dr. Moore? 21 A Yes. 22 Q Who is Dr. Moore? 23 A Dr. Moore owns the practice that 24 Dr. Waldrop works for and Akoda was working for. 25 Q And -- and is that Moore and</p>	<p style="text-align: right;">Page 36</p> <p>1 A From Dr. Moore. 2 Q When you -- when you decided to go with 3 Dr. Waldrop of Dr. Moore's practice as your 4 primary OG -- OB/GYN, what type of research did 5 you do on Dr. Waldrop? 6 A I looked up her -- I looked up reviews. 7 I looked her up on different sites where they give 8 information about credentials and patient reviews. 9 Q Do you remember what any of those were 10 called? 11 A I don't know all of them. I know I 12 looked on Yelp because they give patient reviews, 13 and I think they're pretty honest, but I don't 14 know where I looked up her affiliations. 15 Q Okay. Do you know whether you went to 16 State of Maryland licensing or credential sites to 17 look up Dr. Waldrop? 18 A No, I did not. 19 Q Do you know whether you went to the 20 American Medical Association to look up 21 Dr. Waldrop? 22 A I may have gone to the American Medical 23 Association. 24 Q Okay. 25 A Or the association for gynecologists.</p>
<p style="text-align: right;">Page 35</p> <p>1 Associates; is that -- 2 A Yes. 3 Q -- how they're known as? 4 A Yes. 5 Q Okay. And did you ever meet Dr. Moore 6 during your pregnancy? 7 A I did. 8 Q Okay. 9 A I may have been seen by Dr. Moore once. 10 I met him for sure, like, just to see -- know who 11 he was in case he were to deliver my baby, and I 12 may have been seen by him once when Dr. Waldrop 13 wasn't available. 14 Q Okay. Do you know how many other 15 doctors besides Dr. Akoda and Dr. Waldrop and 16 Dr. Moore that were in the practice when you were 17 going there? 18 A I believe there were only those three. 19 Q Okay. Did you ever hear of a 20 Dr. Chaudry? 21 A I have heard of him. 22 Q And how do you know of Dr. Chaudry? 23 A I believe that Akoda was working for 24 him in a separate practice at the time. 25 Q And how did you come to learn that?</p>	<p style="text-align: right;">Page 37</p> <p>1 Q Okay. And do you know whether there 2 was information on Dr. Waldrop there? 3 A If there was, I didn't find anything 4 negative. 5 Q Okay. And when you went to meet with 6 Dr. Waldrop -- I think you mentioned already you 7 met with Dr. Moore at least once, perhaps, as 8 well -- did you ever meet with Dr. Akoda? 9 A I did not before I was in labor. 10 Q Okay. But you understood he was a 11 member of the practice of Dr. Moore; correct? 12 A Yes, but he did not see patients. 13 Q How do you know he didn't see patients? 14 A They told me that he did not see 15 patients; that he only assisted them at the 16 hospital. 17 Q Okay. Who told you that? 18 A Dr. Moore. 19 Q Okay. And was that after you gave 20 birth to Luka or was that in an earlier meeting 21 while you were -- 22 A That was before. 23 Q Okay. Did you understand from 24 Dr. Waldrop that it was possible that she would 25 not be available to help you in labor and</p>



<p style="text-align: right;">Page 38</p> <p>1 delivery, including a C-section if that were 2 necessary? 3 A Yes, I did. 4 Q How did you know that? 5 A Because Dr. Moore told me that there 6 were three doctors and that if Dr. Waldrop was not 7 available, that Dr. Moore or Akoda would deliver 8 the baby. And that if Waldrop was not available 9 during the practice, then he could see me -- 10 Dr. Moore could see me but Akoda would not see me 11 because he only worked at the hospital. 12 Q And do you recall whether you filled 13 out a consent with Dr. Waldrop that acknowledged 14 that that could be the case and that you could be 15 seen by other doctors other than her if she was 16 not available? 17 A I don't recall, but I'm sure that I 18 did. 19 Q Okay. 20 MR. SHAFFER: I'll mark this. Well, 21 hold on. We'll get to it. 22 BY MR. SHAFFER: 23 Q Did you have any issues with your 24 pregnancy? 25 A I did have some complications. As I</p>	<p style="text-align: right;">Page 40</p> <p>1 I got dizzy. 2 Q Uh-huh. And did you get -- I saw some 3 reference in your -- your medical records to an 4 accommodation from D.C. Public Schools where maybe 5 you were able to work at home for a period of 6 time. 7 Was that part of this situation? 8 A Yes. 9 Q Okay. And . . . 10 A So and -- 11 Q I'm sorry. Go ahead. 12 A I could be alone. I couldn't be, like, 13 out driving alone or, so I worked from home. But 14 if I was going to go out and do things, then I 15 needed somebody to be with me. 16 Q Okay. Did -- did this condition and 17 having this condition and worrying about it cause 18 you stress during the time that you were pregnant? 19 A No, not really because I've had the 20 condition for most of my life. 21 Q Uh-huh. 22 A It was -- once I realized that it 23 wouldn't impact my job, there wasn't much stress 24 related to it. 25 Q Okay. And -- and I think you said</p>
<p style="text-align: right;">Page 39</p> <p>1 mentioned, I had some bleeding early on. I also 2 have a -- a uncommon but benign 3 cardio-neurological disorder called vasovagal 4 syncope that under everyday conditions is truly 5 benign, but pregnancy exacerbated the condition. 6 Q Uh-huh. And what are some of the risks 7 or symptoms that go along with that condition? 8 A Getting dizzy and passing out. 9 Q Okay. 10 A Which is benign unless you hurt 11 yourself on the way down. 12 Q Right. Or -- or a baby if you have a 13 baby? 14 A Yes. 15 Q And, so, as a result of that, were you 16 taking any extra precautions while you were 17 pregnant? Were you anticipating the possibility 18 of having to have medication or anything like 19 that? 20 A I was not anticipating the need for any 21 medication. I was seeing a cardiologist in 22 conjunction with my gynecological visits. And 23 after seven months, I was put on essentially kind 24 of house arrest where I could do everything. I 25 just couldn't be alone for much unless -- in case</p>	<p style="text-align: right;">Page 41</p> <p>1 earlier that -- that Luka was born in May of 2017; 2 correct? 3 A Yes. 4 Q And was he born by C-section? 5 A Yes. 6 Q And was that a planned C-section? 7 A No, it was not. 8 Q What were the circumstances that led to 9 him being born by C-section? 10 A I had been in labor for, I believe, 32 11 hours at that point, and after a period of time, 12 they recommended that I take a drug called Pitocin 13 that they hoped would -- Akoda recommended it to 14 speed up contractions so that I would dilate. 15 Q Uh-huh. 16 A It did not have that effect. 17 And then after 30, 32 hours, he 18 recommended an epidural. Immediately after he did 19 the epidural, he said that my baby was in distress 20 and that he needed an emergency C-section. 21 Q Okay. And was your original plan for 22 birth to go to the hospital and have someone from 23 Dr. Moore's practice deliver vaginally? 24 A Yes, that was my original plan. 25 Q Okay. I saw a reference in your</p>

<p style="text-align: right;">Page 42</p> <p>1 records to a doula or maybe two doulas?</p> <p>2 A Yes.</p> <p>3 Q What role, if any, had you anticipated</p> <p>4 doulas playing in the birth?</p> <p>5 A Doulas provide emotional support during</p> <p>6 the birth. They also help to give the father a</p> <p>7 break and help the father or partner --</p> <p>8 Q Uh-huh.</p> <p>9 A -- to be a more supportive partner.</p> <p>10 Q And had you planned on having a doula</p> <p>11 present for your birth?</p> <p>12 A I did.</p> <p>13 Q Okay. And did that occur?</p> <p>14 A Yes.</p> <p>15 Q Okay. And who was that?</p> <p>16 A Her name is Emily. I forget her last</p> <p>17 name right now. But it was Doulas of Capitol</p> <p>18 Hill.</p> <p>19 Q Uh-huh.</p> <p>20 A And in the contract, the doula is</p> <p>21 present for the first 24 hours and then after that</p> <p>22 they can switch to a backup. I believe that Emily</p> <p>23 was there for maybe 28 hours before she switched</p> <p>24 to a backup which was her partner Nicole.</p> <p>25 Q And did the doula meet you at the</p>	<p style="text-align: right;">Page 44</p> <p>1 contractions when somebody's water breaks, isn't</p> <p>2 it?</p> <p>3 A That is my understanding.</p> <p>4 Q Okay. And -- and -- and is it also</p> <p>5 your understanding that sometimes it works and</p> <p>6 sometimes it doesn't work as well?</p> <p>7 A I did not have much -- much</p> <p>8 understanding of Pitocin.</p> <p>9 Q Okay. Did you receive any information</p> <p>10 from your husband or either of the doulas that</p> <p>11 were in the room with you that -- when Dr. Akoda</p> <p>12 said a C-section was necessary because of the baby</p> <p>13 being in distress, that that wasn't a good idea;</p> <p>14 that you shouldn't go ahead with that?</p> <p>15 A My husband did not agree.</p> <p>16 Q Okay. What did he want to do?</p> <p>17 A He had been watching the monitors, and</p> <p>18 he saw that the stats had gone back up and thought</p> <p>19 that, you know, it looked better; that it should</p> <p>20 be waited out.</p> <p>21 Q Okay. And what about the doulas?</p> <p>22 A The doulas do not advise on medical</p> <p>23 decisions.</p> <p>24 Q Okay.</p> <p>25 A They're there for emotional support.</p>
<p style="text-align: right;">Page 43</p> <p>1 hospital or were you with the doula before you</p> <p>2 went to the hospital?</p> <p>3 A I believe that she met me at the</p> <p>4 hospital.</p> <p>5 Q And when you were describing the length</p> <p>6 of your labor -- and I'm sorry for that length of</p> <p>7 labor -- was that all at the hospital, or did it</p> <p>8 start at home and then continue while you were</p> <p>9 there?</p> <p>10 A It started at Dr. Waldrop's office --</p> <p>11 Q Okay.</p> <p>12 A -- during an examination. My water</p> <p>13 broke.</p> <p>14 Q And -- and my understanding, because I</p> <p>15 have children, too, is that sometimes when your</p> <p>16 water breaks, the rest of the body may not be</p> <p>17 ready to give birth vaginally, but that once the</p> <p>18 water breaks, there's a certain period of time</p> <p>19 before a baby is supposed to be gotten out.</p> <p>20 Is that -- is that a fair summary of</p> <p>21 your understanding at the time?</p> <p>22 A That is my understanding.</p> <p>23 Q Okay. And Pitocin, which you indicated</p> <p>24 Dr. Akoda gave you, is one of the very common</p> <p>25 medicines that they will give to try to move along</p>	<p style="text-align: right;">Page 45</p> <p>1 Q And ultimately, the decision to have</p> <p>2 the C-section was yours then?</p> <p>3 A Yes.</p> <p>4 Q And --</p> <p>5 A I followed Akoda's advice because at</p> <p>6 the time I believed him to be a real doctor.</p> <p>7 Q And when you say "a real doctor," you</p> <p>8 believe today that he is not a real doctor;</p> <p>9 correct?</p> <p>10 A He is a fake doctor.</p> <p>11 Q And what do you mean when you say he's</p> <p>12 a fake doctor?</p> <p>13 A That he was not properly trained as a</p> <p>14 doctor or credentialed as a doctor.</p> <p>15 Q What -- what is it about his training</p> <p>16 that you believe either does or does not make him</p> <p>17 a doctor?</p> <p>18 A That he used fake documents to get into</p> <p>19 the country and was allowed to take medical boards</p> <p>20 without proper credentials.</p> <p>21 Q As you sit here today, do you know</p> <p>22 whether or not Dr. Akoda has gone to medical</p> <p>23 school?</p> <p>24 A I do not know. The federal trial</p> <p>25 transcript that I read, the U.S. government said</p>

<p style="text-align: right;">Page 46</p> <p>1 that there was no evidence that he ever attended 2 or graduated from medical school. 3 Q Okay. Do you know whether or not 4 Dr. Akoda's medical school in Nigeria ever 5 verified the authenticity of his diploma to 6 anyone? 7 A I do not -- 8 MR. ZAJDEL: Objection. Hold on for a 9 second. 10 Objection: The question assumes facts. 11 But you can answer. 12 THE WITNESS: I don't know. 13 BY MR. SHAFFER: 14 Q Do you know whether Dr. Akoda's medical 15 school in Nigeria ever verified the authenticity 16 of Dr. Akoda's diploma to ECFMG? 17 MR. ZAJDEL: Objection: The question 18 assumes facts. You can answer it. 19 THE WITNESS: I'll decline. 20 Should I answer these? 21 MR. ZAJDEL: Yeah, you can answer. 22 THE WITNESS: I don't know. 23 MR. ZAJDEL: Okay. 24 BY MR. SHAFFER: 25 Q Did -- I take it from your answers that</p>	<p style="text-align: right;">Page 48</p> <p>1 take his -- his medical boards. 2 I'm sorry. Can you repeat the 3 question? 4 Q That -- that's okay. I think you 5 answered -- you answered that part of the 6 question. I'll ask you a different question 7 and -- and if it triggers something else, you can 8 add it. 9 I guess I was asking what it was that 10 you knew of that, in your mind, made you say that 11 he was not a real doctor. 12 A That he used multiple different Social 13 Security numbers in order to be approved to take 14 the medical boards; that the U.S. government said 15 there is no evidence that he ever attended medical 16 school or graduated from med- -- medical school. 17 That he was kicked out of a residency program in 18 New Jersey when they discovered that he did not 19 have the credentials to be in that program; that 20 he had been somehow approved by the commission to 21 certify foreign medical graduates. That he took 22 the medical board and failed multiple times, so 23 many times by the time that he passed it nobody 24 would hire him, so then he used another Social 25 Security number to get approved to take the boards</p>
<p style="text-align: right;">Page 47</p> <p>1 you have looked at some of the materials including 2 a press release and, I guess, a transcript of 3 Dr. Akoda's guilty plea with the Department of 4 Justice? 5 A Yes. 6 Q Do you know whether Dr. Akoda pled 7 guilty to not having gone to medical school? 8 A I do not know. 9 Q Okay. Do you know whether or not 10 Dr. Akoda pled guilty to falsifying his diploma? 11 A I don't know, but since he was found 12 guilty of fraud, I'm not sure what things were 13 true and what were not. 14 Q And the thing that he pled guilty to as 15 fraud, do you remember what specifically he 16 admitted doing? 17 A I don't know. 18 Q Okay. And I take it from your answer, 19 then, that -- that having pled guilty to fraud, 20 you don't believe he's a real doctor from your 21 perspective? 22 A I know that he used three -- at least 23 three different Social Security numbers to be 24 approved by the foreign medical board, the board 25 to certify foreign medical graduates, in order to</p>	<p style="text-align: right;">Page 49</p> <p>1 again under another different name. He used three 2 different names. And that he did practices like 3 this in multiple states. 4 So if you were a real doctor, why would 5 you do that? 6 Q Do you know what steps Dr. Akoda had to 7 go through to be able to work in the Prince 8 George's County Hospital where he delivered Luka 9 through C-section? 10 A I don't know all of them. 11 Q Okay. Which ones do you know? 12 A I know that first he'd have to go 13 through the education commission that certifies 14 foreign medical graduates and have all of his 15 documents to be approved to be able to take the 16 medical boards. He'd have to pass the medical 17 boards. He'd have to get into a residency program 18 and be hired and get privileges. 19 Q Okay. Have you ever discussed your 20 experiences with Dr. Akoda with anyone from the 21 Educational Commission for Foreign Medical 22 Graduates? 23 A No, I have not. 24 Q Okay. Have you ever spoken with anyone 25 there?</p>



<p style="text-align: right;">Page 50</p> <p>1 A No, I have not.</p> <p>2 Q Not -- for any reason?</p> <p>3 A No.</p> <p>4 Q No.</p> <p>5 Have you -- what information, if any,</p> <p>6 do you have about ECFMG?</p> <p>7 A My understanding is that if you are a</p> <p>8 graduate of a medical program from outside of the</p> <p>9 United States, then that is where you first have</p> <p>10 to get approved to be able to do any next steps.</p> <p>11 Q And what's --</p> <p>12 A And your --</p> <p>13 Q I'm sorry.</p> <p>14 A Your documentation has to be verified</p> <p>15 at that office.</p> <p>16 Q And how -- what's the basis for that</p> <p>17 information? How do you know that?</p> <p>18 A I looked it up when I found out from</p> <p>19 the Justice Department that Akoda was a fraud. I</p> <p>20 looked up what that government agency did.</p> <p>21 Q And when you say "that government</p> <p>22 agency," who are you referring to?</p> <p>23 A The educational commission to certify</p> <p>24 foreign medical graduates.</p> <p>25 Q And what --</p>	<p style="text-align: right;">Page 52</p> <p>1 looked them up, but that was two years ago.</p> <p>2 Q Okay. Do you know whether or not --</p> <p>3 strike that.</p> <p>4 You mentioned that you understood that</p> <p>5 ECFMG -- I forget what the word is -- verifies</p> <p>6 documentation of foreign medical students or</p> <p>7 graduates; correct?</p> <p>8 A Yes.</p> <p>9 Q What documents is it your understanding</p> <p>10 ECFMG is supposed to verify?</p> <p>11 A I don't know exactly, but I would</p> <p>12 understand a diploma --</p> <p>13 Q Okay.</p> <p>14 A -- for one. From my -- it's been a</p> <p>15 while since I looked this up, but I remember that</p> <p>16 there were schools that were specifically, like,</p> <p>17 vetted or listed with the commission, and so they</p> <p>18 would have to verify that those diplomas were real</p> <p>19 or that the person graduated from that</p> <p>20 institution.</p> <p>21 Q Anything else?</p> <p>22 A I don't know.</p> <p>23 Q Do you know where Dr. Waldrop went to</p> <p>24 medical school?</p> <p>25 A I believe she did a residency at</p>
<p style="text-align: right;">Page 51</p> <p>1 A I think I'm calling them the wrong</p> <p>2 thing, but you know what I mean.</p> <p>3 Q I understood when you were saying that</p> <p>4 the commission to certify foreign medical</p> <p>5 graduates --</p> <p>6 A Okay.</p> <p>7 Q -- you were meaning --</p> <p>8 A Yes.</p> <p>9 Q -- the company that you sued in</p> <p>10 Philadelphia, the ECFMG; is that --</p> <p>11 We've been saying -- meaning the same</p> <p>12 thing?</p> <p>13 A Yes.</p> <p>14 Q Okay. Great.</p> <p>15 And you mentioned it, I think -- we</p> <p>16 could check your answer. I'm just trying to make</p> <p>17 sure I understand -- that ECFMG is -- is a</p> <p>18 governmental entity of some kind?</p> <p>19 A That's what I thought. Is that --</p> <p>20 Q And what -- what part of the government</p> <p>21 does ECFMG work with?</p> <p>22 A I don't know.</p> <p>23 Q Do you know on what basis you think</p> <p>24 that would be the case?</p> <p>25 A I don't know. I thought that when I</p>	<p style="text-align: right;">Page 53</p> <p>1 Howard.</p> <p>2 Q Okay. And how about medical school</p> <p>3 before that?</p> <p>4 A I don't remember.</p> <p>5 Q Okay. And do you know where Dr. Moore</p> <p>6 went to medical school?</p> <p>7 A I don't remember.</p> <p>8 Q Okay. Do you know whether Dr. Moore is</p> <p>9 a -- went to a U.S. medical school or a foreign</p> <p>10 medical school?</p> <p>11 A I do not know.</p> <p>12 Q Okay. I'll finish up on -- on the</p> <p>13 birth of Luka. You had the C-section after a very</p> <p>14 lengthy labor.</p> <p>15 Was -- how was Luka's birth? Was he</p> <p>16 born okay? Any health problems?</p> <p>17 A Luka has had no health problems.</p> <p>18 Q Great.</p> <p>19 And did you have any symptoms or</p> <p>20 physical conditions after the C-section?</p> <p>21 A No, I did not, nothing atypical.</p> <p>22 Q Right.</p> <p>23 It's a major abdominal surgery, so</p> <p>24 there was probably some recovery; right?</p> <p>25 A Yes.</p>

<p style="text-align: right;">Page 54</p> <p>1 Q Okay.</p> <p>2 A Having knowing what -- that Akoda is a</p> <p>3 fraud, I do question whether or not my C-section</p> <p>4 was necessary.</p> <p>5 Q Okay. And that was something that you</p> <p>6 started -- you thought of after you found the</p> <p>7 information sometime in 2017 related to</p> <p>8 Dr. Akoda's guilty plea?</p> <p>9 A Well, before that because my husband at</p> <p>10 the time did not believe that it was necessary,</p> <p>11 and then once I found that information out, it</p> <p>12 made me question it more.</p> <p>13 Q Okay. Do you know what the -- did you</p> <p>14 ever ask Dr. Moore or Dr. Waldrop whether they</p> <p>15 would have had you do a C-section after 32 hours</p> <p>16 of labor and a baby in distress?</p> <p>17 A I did not speak to Dr. Moore --</p> <p>18 Dr. Waldrop once I found out Akoda was a fraud.</p> <p>19 Q Did you speak with Dr. Moore at any</p> <p>20 point after you learned the information about</p> <p>21 Dr. Akoda?</p> <p>22 A I did.</p> <p>23 Q Okay. Tell me about that.</p> <p>24 A I went to him to find out, A, if he</p> <p>25 knew; and why he had not notified patients that</p>	<p style="text-align: right;">Page 56</p> <p>1 Q Okay. And what do you recall about</p> <p>2 that meeting with Dr. Moore?</p> <p>3 A Dr. Moore seemed just as surprised, and</p> <p>4 he told me that he had also been working for</p> <p>5 another doctor's office, Dr. Chaudry.</p> <p>6 Q Okay. Did you ask Dr. Moore any</p> <p>7 questions or express any views to him?</p> <p>8 A I did. I asked him -- I was trying to</p> <p>9 make sense of what happened, and he told me they</p> <p>10 raided his -- Akoda's office, I believe, at</p> <p>11 Chaudry's office and his home, and they discovered</p> <p>12 machines that make, like things to make diplomas</p> <p>13 with and details like that.</p> <p>14 I asked him why he didn't notify</p> <p>15 patients.</p> <p>16 Q Uh-huh.</p> <p>17 A And he said that wasn't a requirement</p> <p>18 or . . .</p> <p>19 Q How did you feel about that response?</p> <p>20 A It's upsetting because I think every</p> <p>21 woman who has ever been a patient of Akoda should</p> <p>22 know that he was not a real doctor.</p> <p>23 Q And the response you got from Dr. Moore</p> <p>24 who, if I'm understanding it correctly, had hired</p> <p>25 Dr. Akoda into his practice, was it wasn't his</p>
<p style="text-align: right;">Page 55</p> <p>1 Akoda was a fraud.</p> <p>2 Q And at this point in time, you were not</p> <p>3 a patient in that practice anymore; correct?</p> <p>4 A No, I was no longer --</p> <p>5 Q Okay. And --</p> <p>6 A I would have still been, but I wasn't</p> <p>7 pregnant or needing women's care.</p> <p>8 Q Right.</p> <p>9 So you -- why did you go to Dr. Moore</p> <p>10 instead of Dr. Waldrop?</p> <p>11 A Because Dr. Moore is the head of the</p> <p>12 practice.</p> <p>13 Q Okay. And how did you make contact to</p> <p>14 go meet with Dr. Moore?</p> <p>15 A I set an appointment.</p> <p>16 Q Okay.</p> <p>17 A I called the office.</p> <p>18 Q Okay. Did you tell them what you</p> <p>19 wanted to talk about?</p> <p>20 A No. I might have. I don't know.</p> <p>21 Q Okay. And do you remember how long</p> <p>22 after you had met with -- you had seen the</p> <p>23 information of Dr. Akoda's guilty plea that you</p> <p>24 went to talk to Dr. Moore?</p> <p>25 A I don't know, but it was fairly soon.</p>	<p style="text-align: right;">Page 57</p> <p>1 place to do it or he didn't have to do it; it</p> <p>2 wasn't a requirement for him to do it?</p> <p>3 A He felt -- and I don't remember exactly</p> <p>4 how he said it, but he felt that he had been duped</p> <p>5 as well.</p> <p>6 Q Okay. Did you ask him what type of</p> <p>7 investigation or vetting he had done of Dr. Akoda</p> <p>8 before hiring him?</p> <p>9 A I did, and he said he had worked with</p> <p>10 him in the residency program at Howard University.</p> <p>11 Q Did you ask him about doing any kind of</p> <p>12 background check or investigation of him before</p> <p>13 hiring him?</p> <p>14 A I did, and he said that he had worked</p> <p>15 with him in the Howard residency program.</p> <p>16 Q Okay. Did he tell you whether he had</p> <p>17 done a background check or not?</p> <p>18 A He did not.</p> <p>19 Q He did not tell you or he did not do</p> <p>20 one?</p> <p>21 A He said he did not do one.</p> <p>22 Q Okay. What was your reaction to that</p> <p>23 answer?</p> <p>24 A I was surprised, but he said that</p> <p>25 because of all of the certifications and everyone</p>

<p style="text-align: right;">Page 58</p> <p>1 who had would have had to do it by contracts, that  2 he didn't feel it was necessary --  3 Q Okay.  4 A -- because he had been -- he had gotten  5 privileges at P.G. County; he had been approved  6 from these other organizations.  7 Q Did he tell you whether or not he in  8 the future would be considering doing background  9 checks of people he hired to be doctors in his  10 practice?  11 A Yes, he did.  12 Q What did he say?  13 A He said he would consider doing that.  14 Q And what was your reaction to that?  15 A I thought that that would be a good  16 idea.  17 Q In your position at D.C. Public  18 Schools, did they have to do a background check on  19 you before hiring you?  20 A Yes, they do.  21 Q And they're your employer; right?  22 A Yes.  23 MR. SHAFFER: Let's take a short --  24 short five-minute break --  25 THE WITNESS: Okay.</p>	<p style="text-align: right;">Page 60</p> <p>1 Q So as of today, you don't have a  2 primary care doctor?  3 A No.  4 Q Have you seen -- have you seen any  5 doctor of any kind since June of 2017?  6 A Yes.  7 Q Who is that?  8 A I have seen -- I don't know the  9 doctor's name. It was at an urgent care facility  10 in Costa Rica called (speaking Spanish).  11 Q Okay. And why did you go there?  12 A I -- Dr. Waldrop, after my son was  13 born --  14 Q Uh-huh.  15 A -- placed an IUD --  16 Q Uh-huh.  17 A -- and I was having complications from  18 the IUD.  19 Q Okay. And, again, just so I get the  20 timeline correct, Luka was born in May of '16.  21 A Yes.  22 Q When did you have the IUD implanted?  23 A Probably six months after.  24 Q Okay. So end of 2016?  25 A That's pretty -- yes.</p>
<p style="text-align: right;">Page 59</p> <p>1 MR. SHAFFER: -- and then we'll pick  2 back up.  3 THE VIDEOGRAPHER: Off the record at  4 2:50.  5 (Recess -- 2:50 p.m.)  6 (After recess -- 3:15 p.m.)  7 THE VIDEOGRAPHER: We are back on the  8 record at 3:15.  9 BY MR. SHAFFER:  10 Q Ms. Russell, we're back on the record  11 after a short break. You understand you're still  12 under oath?  13 A Yes.  14 Q Okay. I'm going to talk a little bit  15 about some of the doctors that you've seen over  16 your adult life and I'll just make sure I  17 understand some of the chronology on that.  18 Do you currently have a primary care  19 doctor that you see?  20 A Not really.  21 Q Do you have a doctor that you've seen  22 from time to time for general issues, colds or  23 antibiotics or anything like that?  24 A I did, but not since discovering about  25 Akoda. I have not found a primary care doctor.</p>	<p style="text-align: right;">Page 61</p> <p>1 Q Beginning of 2017, something like that?  2 A Something around there.  3 Q Okay. And when did your contract  4 with -- when did you go to Costa Rica?  5 A In the last week of July of 2018.  6 Q And -- and since July of 2018, when  7 have you come back to the States?  8 A I came back for the December break last  9 year.  10 Q So that would have been December of  11 '18?  12 A Yes.  13 And then I came back this summer in  14 July -- essentially the month of July.  15 Q Okay. And in neither December of  16 '18 or summer of '19, you didn't see any doctors  17 here in the U.S.; correct?  18 A No.  19 Q Okay. And before going to Costa Rica  20 in around July of '18, had you seen any doctors  21 between when you got the IUD put in and you went  22 to Costa Rica?  23 A I -- I'm not sure when I last saw  24 Dr. Major. Dr. Major was my primary care  25 physician for about ten years.</p>



<p style="text-align: right;">Page 62</p> <p>1 Q Okay.</p> <p>2 A And I'm not sure when I last saw him,</p> <p>3 but it was -- I did see him after I found out</p> <p>4 about Akoda.</p> <p>5 Q Okay. And Dr. Major is his name?</p> <p>6 A Yes.</p> <p>7 Q And you said he is a primary care</p> <p>8 doctor?</p> <p>9 A Yes.</p> <p>10 Q And where is his office?</p> <p>11 A He has an office in Silver Spring,</p> <p>12 Maryland, and in Clinton, Maryland, I believe is</p> <p>13 the other one.</p> <p>14 Q And where did you see him?</p> <p>15 A I've seen him at both, but mostly the</p> <p>16 Silver Spring office.</p> <p>17 Q And you said he's been your primary</p> <p>18 care doctor for about ten years?</p> <p>19 A Yes.</p> <p>20 Q And you saw him at some point between</p> <p>21 June of 2017 and today?</p> <p>22 A Yes.</p> <p>23 Q How many times?</p> <p>24 A Once.</p> <p>25 Q Okay. When do you think that was,</p>	<p style="text-align: right;">Page 64</p> <p>1 A He was really surprised, and he --</p> <p>2 during my pregnancy, he told me that he knew</p> <p>3 Daniel Waldrop, my OB/GYN, and that they had known</p> <p>4 each other for a number of years, but he didn't</p> <p>5 say much about it. He was just really surprised.</p> <p>6 But knowing that he had a close</p> <p>7 relationship with the office, I did not feel</p> <p>8 comfortable seeing him anymore.</p> <p>9 Q Okay. And did you tell him that when</p> <p>10 you went and met with him?</p> <p>11 A No.</p> <p>12 Q Okay. Did you --</p> <p>13 A I just stopped going.</p> <p>14 Q Okay. And I think you -- you said that</p> <p>15 you don't recall why you went to see Dr. Major?</p> <p>16 A No, I don't know.</p> <p>17 Q How did you originally start going to</p> <p>18 see Dr. Major?</p> <p>19 A I was a teacher. I got sick a lot.</p> <p>20 And the -- my -- the primary care physician I had</p> <p>21 at the time, Ms. Shelly something, she could never</p> <p>22 see me on the day that I was sick. And, so, I</p> <p>23 went on my insurance Web site and found another</p> <p>24 doctor, looked up reviews and everything, and this</p> <p>25 doctor -- people said that they were able to get</p>
<p style="text-align: right;">Page 63</p> <p>1 approximately?</p> <p>2 A Maybe July. It was shortly after I</p> <p>3 found out.</p> <p>4 Q Okay.</p> <p>5 A And I didn't know when I saw him what I</p> <p>6 was -- what I was going to do. I didn't -- so it</p> <p>7 must have been soon after I found out.</p> <p>8 Q And did you make an appointment to go</p> <p>9 in and see him?</p> <p>10 A Yes.</p> <p>11 Q Okay. And did you get any treatment</p> <p>12 from him while you were there?</p> <p>13 A I don't remember why I went to see him.</p> <p>14 Q Okay. But you think this was probably</p> <p>15 shortly after you found out about Dr. Akoda in the</p> <p>16 2017 -- summer of 2017?</p> <p>17 A Yes, because I told him about it.</p> <p>18 Q Okay. And what -- what did you tell</p> <p>19 him?</p> <p>20 A I told him that I found out that the</p> <p>21 doctor was a fake.</p> <p>22 Q Okay.</p> <p>23 A And that he was -- had been charged and</p> <p>24 tried by the U.S. government.</p> <p>25 Q Okay. What did Dr. Major say?</p>	<p style="text-align: right;">Page 65</p> <p>1 in quickly and, you know, really positive</p> <p>2 experiences. And, so, I switched to Dr. Major.</p> <p>3 Q Okay. And where did Dr. Major go to</p> <p>4 medical school?</p> <p>5 A I don't remember.</p> <p>6 Q Do you know if Dr. Major has ever been</p> <p>7 convicted to a crime?</p> <p>8 A Not to my knowledge. I looked him up</p> <p>9 on a -- a state of Maryland site where you can</p> <p>10 look for sanctions and things --</p> <p>11 Q Okay.</p> <p>12 A -- and there was nothing there.</p> <p>13 Q Okay. When did you do that?</p> <p>14 A I don't remember.</p> <p>15 Q Was it after you found out about</p> <p>16 Dr. Akoda?</p> <p>17 A Yes. I didn't know that the site</p> <p>18 existed before then.</p> <p>19 Q Okay. And other than Dr. Major, have</p> <p>20 you seen any other doctors since the middle of</p> <p>21 2017?</p> <p>22 A Only in Costa Rica and only in urgent</p> <p>23 care.</p> <p>24 Q Okay. You currently have an OB/GYN?</p> <p>25 A No. I have seen an OB/GYN because of</p>

<p style="text-align: right;">Page 66</p> <p>1 the problem with my IUD, but I don't currently 2 have one.</p> <p>3 Q And was that someone you saw in Costa 4 Rica or someone you saw here?</p> <p>5 A I saw someone in Costa Rica.</p> <p>6 Q Okay. And when was that, 7 approximately?</p> <p>8 A It was last year. I don't -- I don't 9 remember when last year, but I went to urgent care 10 because I was having pain and bleeding, and they 11 did an x-ray and confirmed my IUD was still 12 there --</p> <p>13 Q Uh-huh.</p> <p>14 A -- but were concerned that it had moved 15 or shifted somehow. And, so, they wanted me to 16 see an OB/GYN.</p> <p>17 Q Okay. And you went and did that?</p> <p>18 A Uh-huh.</p> <p>19 Q Okay.</p> <p>20 A Yes.</p> <p>21 Q And were you treated for issues with 22 the IUD?</p> <p>23 A Yes.</p> <p>24 Q Okay. And was that successful? Did 25 they --</p>	<p style="text-align: right;">Page 68</p> <p>1 I go for urgent care.</p> <p>2 Q Okay. And, excuse me, what -- what are 3 you doing physical therapy for?</p> <p>4 A My back.</p> <p>5 Q Okay. And is that -- how long have you 6 had that condition?</p> <p>7 A Probably since my son was about a year 8 old, so about 2017.</p> <p>9 Q And has it -- has it been diagnosed 10 as --</p> <p>11 A Stress related.</p> <p>12 Q Okay. And when did the stress start or 13 the stress that -- that you've been told relates 14 to the back injury?</p> <p>15 A The pain started after my son was about 16 a year, which would have been June of 2017.</p> <p>17 Q And had you ever suffered from stress 18 or anxiety prior to June of 2017?</p> <p>19 A Yes.</p> <p>20 Q Okay. And what -- what can you tell me 21 about that?</p> <p>22 A When I lost my sister in 2007, I had 23 stress-related back pain.</p> <p>24 Q Okay. And that was -- were you treated 25 for depression or anxiety or stress in -- in 2007?</p>
<p style="text-align: right;">Page 67</p> <p>1 A Yes.</p> <p>2 Q -- fix it?</p> <p>3 A Sorry.</p> <p>4 Q That's okay. Sure.</p> <p>5 A Yes. I was treated. They removed the 6 IUD, the doctor did.</p> <p>7 Q Okay. And that was down in Costa 8 Rica --</p> <p>9 A Yes.</p> <p>10 Q -- sometime last year?</p> <p>11 A Yes. It wasn't a surgical procedure.</p> <p>12 Q Uh-huh. Okay. And other than the 13 urgent care and the doctor in Costa Rica and 14 seeing Dr. Major, have you seen any other doctors 15 or -- or health care providers in -- since the 16 mid-2017?</p> <p>17 A I get physical therapy, but not from a 18 doctor.</p> <p>19 Q Okay. Where do you get that?</p> <p>20 A In Costa Rica and in the States. In 21 the States, I see a woman that my husband has seen 22 for 15 years, maybe.</p> <p>23 Q Uh-huh.</p> <p>24 A And in Costa Rica, I see a physical 25 therapist that I found through the same place that</p>	<p style="text-align: right;">Page 69</p> <p>1 A I was treated for depression, briefly.</p> <p>2 Q Okay.</p> <p>3 A And for, maybe two weeks, given 4 medication for my back and then taught breathing 5 exercises to alleviate the pain when stressful 6 situations occurred.</p> <p>7 Q Okay. Were you ever provided an 8 antidepressant or anything like that?</p> <p>9 A I was shortly after my sister's death.</p> <p>10 Q Okay. And do you remember which one?</p> <p>11 A I think it was Lexapro.</p> <p>12 Q Okay. And for how long did you take 13 that?</p> <p>14 A Several months, maybe -- no more than 15 six months.</p> <p>16 Q Okay. Are you on any medications 17 today?</p> <p>18 A No.</p> <p>19 Q Okay.</p> <p>20 A Just vitamins.</p> <p>21 Q In terms of other types of treatment, 22 have you ever in your adult life seen a 23 psychologist or a psychiatrist for treatment?</p> <p>24 A No.</p> <p>25 Q Have you ever gone into therapy at any</p>

<p style="text-align: right;">Page 70</p> <p>1 point in your adult life?</p> <p>2 A No.</p> <p>3 Q And, so, you're not currently being</p> <p>4 treated by a psychiatrist or psychologist?</p> <p>5 A No, I'm not.</p> <p>6 Q Other than Dr. Major and Dr. Moore's</p> <p>7 practice, and the doctor at urgent care and the</p> <p>8 doctor that you saw in Costa Rica -- Rica</p> <p>9 regarding the IUD and your physical therapist,</p> <p>10 what other doctors have you seen in your adult</p> <p>11 life?</p> <p>12 A I have a cardiologist who helped</p> <p>13 diagnose my condition.</p> <p>14 Q And that's the --</p> <p>15 A Dr. Howell, Shawn Howell.</p> <p>16 Q And that's the condition you were</p> <p>17 talking about earlier?</p> <p>18 A Yes, vasovagal syncope.</p> <p>19 Q You said it better than me.</p> <p>20 A And I did see her periodically</p> <p>21 throughout my pregnancy for monitoring.</p> <p>22 Q And this is Shawn Howell?</p> <p>23 A Yes.</p> <p>24 Q And where is she -- where does she</p> <p>25 practice?</p>	<p style="text-align: right;">Page 72</p> <p>1 How did you come to see Dr. Major?</p> <p>2 A I found him through my insurance --</p> <p>3 Q You did say that, okay.</p> <p>4 Do you -- do you ever have to take Luka</p> <p>5 to the doctor?</p> <p>6 A Yes.</p> <p>7 Q Where -- where does he go to the</p> <p>8 doctors?</p> <p>9 A He goes to a doctor in Costa Rica.</p> <p>10 Q Okay. Is it a pediatric practice?</p> <p>11 A Yes.</p> <p>12 Q Okay. What -- what's the name of the</p> <p>13 practice?</p> <p>14 A Dr. Holtermann.</p> <p>15 Q Okay. And how did you find</p> <p>16 Dr. Holtermann?</p> <p>17 A Through the same way they found my</p> <p>18 physical therapist.</p> <p>19 Q Okay.</p> <p>20 A The -- I don't know what it's called.</p> <p>21 They call it a hospital, but it's like more than a</p> <p>22 hospital --</p> <p>23 Q Sort of a --</p> <p>24 A More of a center.</p> <p>25 Q -- like a clinic provider, something</p>
<p style="text-align: right;">Page 71</p> <p>1 A I believe on K Street.</p> <p>2 Q A couple of blocks from us here?</p> <p>3 A Yes, very close by.</p> <p>4 Q Does she have hospital privileges?</p> <p>5 A I don't know.</p> <p>6 Q Okay. Do you know where she went to</p> <p>7 medical school?</p> <p>8 A I don't remember. It might have been</p> <p>9 Howard.</p> <p>10 Q Okay. And do you know if she's board</p> <p>11 certified?</p> <p>12 A I believe she is.</p> <p>13 Q Okay. Do you know by what board?</p> <p>14 A I do not.</p> <p>15 Q Okay. Any other doctors?</p> <p>16 A In my adult life, certainly. I don't</p> <p>17 remember any more than that. I know there are --</p> <p>18 I know it -- before Dr. Major I had a different</p> <p>19 primary care physician and a different OB/GYN. I</p> <p>20 don't remember their names.</p> <p>21 Q Okay. And do you know how you went to</p> <p>22 start seeing Dr. Howell?</p> <p>23 A I was recommended by Dr. Major.</p> <p>24 Q Okay. And I apologize if I asked you</p> <p>25 this already, but I can't remember the answer.</p>	<p style="text-align: right;">Page 73</p> <p>1 like that?</p> <p>2 A Yes.</p> <p>3 Q A one-stop shop for --</p> <p>4 A Yes.</p> <p>5 Q -- primary care, pediatrics, maybe a</p> <p>6 pharmacy, maybe physical therapy?</p> <p>7 A It's not all in one place, but it's</p> <p>8 like a network.</p> <p>9 Q Got it. And that is through the school</p> <p>10 that you are with --</p> <p>11 A No.</p> <p>12 Q -- that you were given that? No?</p> <p>13 Okay. Do you have health insurance?</p> <p>14 A I do.</p> <p>15 Q Okay. And does the health insurance</p> <p>16 cover Dr. Holtermann and --</p> <p>17 A The health insurance doesn't cover</p> <p>18 much. It doesn't cover my child.</p> <p>19 Q Okay. And so when you go to see</p> <p>20 Dr. Holtermann, do you pay for it or --</p> <p>21 A Yes.</p> <p>22 Q And --</p> <p>23 A I -- I use a -- in Costa Rica, they</p> <p>24 have a medical discount program that -- because</p> <p>25 Costa Rica has socialized health care.</p>



<p style="text-align: right;">Page 74</p> <p>1 Q Uh-huh.</p> <p>2 A And I have international health</p> <p>3 insurance because I go back and forth.</p> <p>4 Q Uh-huh.</p> <p>5 A But in the country, I used -- I use</p> <p>6 this medical discount program that feels like what</p> <p>7 we would think of as insurance --</p> <p>8 Q Uh-huh.</p> <p>9 A -- but it's not insurance.</p> <p>10 Q Got it.</p> <p>11 Other than Dr. Holtermann, have you had</p> <p>12 to take your son to see any other doctors?</p> <p>13 A I did have to take him to urgent care.</p> <p>14 Q And what types of things have you taken</p> <p>15 him to see Dr. Holtermann or urgent care? Typical</p> <p>16 colds and --</p> <p>17 A For urgent care, I took him for a</p> <p>18 fever.</p> <p>19 Q Uh-huh.</p> <p>20 A And for Holtermann I took him because</p> <p>21 the school requires an annual wellness check.</p> <p>22 Q Okay. And so, you've taken him two</p> <p>23 times now to do that or just once?</p> <p>24 A And he had hand, foot and mouth.</p> <p>25 Q Also a right of passage probably in the</p>	<p style="text-align: right;">Page 76</p> <p>1 And I don't feel equipped to do</p> <p>2 background checks on doctors myself.</p> <p>3 I feel violated, and it makes it very</p> <p>4 difficult to -- I'm sorry. It makes it very</p> <p>5 difficult to see an OB/GYN.</p> <p>6 Q And I take it that when you found out</p> <p>7 about Dr. Akoda's guilty plea regarding the use of</p> <p>8 Social Security numbers, that . . .</p> <p>9 MR. SHAFFER: There's some tissues back</p> <p>10 there.</p> <p>11 BY MR. SHAFFER:</p> <p>12 Q Here you go.</p> <p>13 I take it when you found out about the</p> <p>14 guilty plea, you -- you were angry with Dr. Moore</p> <p>15 and Dr. Waldrop who you had seen in connection</p> <p>16 with that pregnancy; right?</p> <p>17 A No. I was angry in general, but I</p> <p>18 don't necessarily hold blame or anger towards</p> <p>19 Dr. Waldrop and Dr. Moore because they relied on</p> <p>20 sources they should have been able to trust. For</p> <p>21 example, I was a teacher. I had to have</p> <p>22 background -- extensive background checks done in</p> <p>23 order to hold a job within DCPS. So when I rented</p> <p>24 my basement apartment, and as a mother I wanted to</p> <p>25 find somebody safe to live in the home with us,</p>
<p style="text-align: right;">Page 75</p> <p>1 lower school; right?</p> <p>2 A Yes.</p> <p>3 Q Okay. And I understand that you, as</p> <p>4 you've said in -- in written responses to</p> <p>5 interrogatories, that you -- you have suffered</p> <p>6 from emotional distress as a result of learning</p> <p>7 about Dr. Akoda; is that right?</p> <p>8 A Yes.</p> <p>9 Q And what in particular is it that you</p> <p>10 are experiencing as a result of what you found out</p> <p>11 about Dr. Akoda?</p> <p>12 A I feel violated by Dr. Akoda. I feel a</p> <p>13 sense of distrust in the medical community in</p> <p>14 general. Like I wouldn't want, for example, to go</p> <p>15 find a therapist to see to talk to about these</p> <p>16 things because how do I what their certification</p> <p>17 is worth or their licensure is worth based on how</p> <p>18 far doctor -- not even a doctor, how far Akoda got</p> <p>19 with false papers.</p> <p>20 I don't trust the institutions that are</p> <p>21 in place to -- to check that these doctors are who</p> <p>22 they say they are, doing the right thing, or have</p> <p>23 the credentials they do, which makes it very hard</p> <p>24 for me to then use sources I would have used to</p> <p>25 check on a doctor.</p>	<p style="text-align: right;">Page 77</p> <p>1 and a teacher applied, I didn't feel like I needed</p> <p>2 to run the full background check on them because I</p> <p>3 knew that they had gone through that background</p> <p>4 check with the public school system. So, instead,</p> <p>5 I could do -- rely on other sources because I</p> <p>6 trusted the school system's background check.</p> <p>7 So I didn't hold anger. I was very</p> <p>8 surprised that Dr. Moore hadn't done a background</p> <p>9 check, but I understood why he relied on</p> <p>10 institutions like the commission to certify</p> <p>11 foreign medical graduates instead of doing it all</p> <p>12 over again himself.</p> <p>13 Q And your view there is that your</p> <p>14 understanding of ECFMG as a governmental entity,</p> <p>15 that it would do background checks on people like</p> <p>16 Dr. Akoda --</p> <p>17 A Yes.</p> <p>18 Q -- correct?</p> <p>19 And I --</p> <p>20 A Yes --</p> <p>21 Q I'm sorry. Go ahead.</p> <p>22 A At least to verify that they had</p> <p>23 attended and graduated school.</p> <p>24 Q And do you know whether ECFMG tried to</p> <p>25 do that?</p>

<p style="text-align: right;">Page 78</p> <p>1 A I do not know.</p> <p>2 Q Okay.</p> <p>3 A But if they did, they seemed to have</p> <p>4 failed.</p> <p>5 Q Do you know whether ECFMG ever</p> <p>6 identified that Dr. Akoda had used multiple names</p> <p>7 to try to come and take examinations with ECFMG?</p> <p>8 A I do not know.</p> <p>9 Q Do you know whether ECFMG ever helped</p> <p>10 the Department of Justice build a case and</p> <p>11 prosecute a case against Dr. Akoda?</p> <p>12 A I do not know.</p> <p>13 Q Okay. And do you know whether or not</p> <p>14 ECFMG ever received verification from Dr. Akoda's</p> <p>15 Nigerian medical school as to whether or not his</p> <p>16 diploma was authentic?</p> <p>17 MR. ZAJDEL: Objection. That assumes</p> <p>18 facts.</p> <p>19 You can answer.</p> <p>20 THE WITNESS: I do not know.</p> <p>21 MR. SHAFFER:</p> <p>22 Q You filed a suit against Dimensions</p> <p>23 Health Care in Maryland; correct?</p> <p>24 A Yes.</p> <p>25 Q When did you do that?</p>	<p style="text-align: right;">Page 80</p> <p>1 Q Okay. Did it include the other</p> <p>2 practice with Dr. Chaudry that Dr. Akoda was</p> <p>3 apparently associated with?</p> <p>4 A I don't know.</p> <p>5 Q Okay. What did you understand that you</p> <p>6 were saying in filing that lawsuit?</p> <p>7 A That I was suing similarly to this suit</p> <p>8 for emotional distress and representing a class.</p> <p>9 Q Okay. And -- and you were suing</p> <p>10 Dimensions Health Corporation which you understood</p> <p>11 to be the Prince George's County Hospital, among</p> <p>12 others, because you believed that they should</p> <p>13 have -- they were responsible for the emotional</p> <p>14 distress that you felt from Dr. Akoda's actions?</p> <p>15 A I believe that they share in the</p> <p>16 responsibility along with the commission to</p> <p>17 certify foreign medical graduates.</p> <p>18 Q Okay. Who else shares in that</p> <p>19 responsibility?</p> <p>20 A I don't know, but I think they are the</p> <p>21 two most responsible because the commission to</p> <p>22 certify foreign medical graduates is the first</p> <p>23 gatekeeper, and Dimensions is the -- oversees the</p> <p>24 entire hospital.</p> <p>25 Q Do you know whether ECFMG licenses</p>
<p style="text-align: right;">Page 79</p> <p>1 A I don't remember exactly --</p> <p>2 Q Okay.</p> <p>3 A -- but . . .</p> <p>4 Q We probably have a document in all our</p> <p>5 documents here that --</p> <p>6 A Probably --</p> <p>7 Q -- says --</p> <p>8 A -- so.</p> <p>9 Q -- when that occurred.</p> <p>10 You think it was sometime in 2018 or</p> <p>11 earlier than that?</p> <p>12 A I don't know.</p> <p>13 Q Okay. And when you were suing</p> <p>14 Dimensions Health Corporation, who did you</p> <p>15 understand that that encompassed? Who was that?</p> <p>16 A The company that owns the hospital</p> <p>17 where my son was born where Akoda performed a</p> <p>18 C-section.</p> <p>19 Q Did that include Dr. Moore's practice?</p> <p>20 A I don't know. I don't know.</p> <p>21 Q I'm sorry?</p> <p>22 A I don't know.</p> <p>23 Q Okay. Did it include Dr. Akoda's --</p> <p>24 personally Dr. Akoda?</p> <p>25 A I don't know.</p>	<p style="text-align: right;">Page 81</p> <p>1 physicians to practice in the U.S.?</p> <p>2 A Not to my knowledge.</p> <p>3 Q Okay. Do you know who licenses</p> <p>4 physicians to practice in hospitals in Maryland?</p> <p>5 A I do not, but I would assume it's a</p> <p>6 state organization.</p> <p>7 Q Okay. And do you believe that the</p> <p>8 state bears any responsibility for what -- your</p> <p>9 emotional distress that you feel from Dr. Akoda?</p> <p>10 A I think it would depend on the nature</p> <p>11 of the relationship between -- and the process of</p> <p>12 how state licensure is determined based on what</p> <p>13 the foreign medical -- the commission to certify</p> <p>14 foreign medical graduates does.</p> <p>15 Q And, so, if the licensure board has</p> <p>16 responsibility to do its own investigation of</p> <p>17 anybody it's going to license, would you agree</p> <p>18 with me that they would share responsibility, in</p> <p>19 your view, for any of the emotional distress that</p> <p>20 you believe was caused by Dr. Akoda?</p> <p>21 A Yes, I would, but I think it would not</p> <p>22 be possible for them to license if the commission</p> <p>23 to certify foreign medical graduates had stopped</p> <p>24 Akoda from being able to enter the country and</p> <p>25 take the medical boards in the first place.</p>

<p style="text-align: right;">Page 82</p> <p>1 Q And do you know whether Dr. Akoda ever 2 lied to ECFMG?</p> <p>3 A To my understanding, he did. He used 4 three different Social Security numbers and 5 multiple names to come through and get approved to 6 take boards multiple times.</p> <p>7 Q Do you know whether Dr. Akoda did a 8 residency in the U.S.?</p> <p>9 A My understanding is that he started a 10 residency in New Jersey before they discovered 11 that he was a fraud and referred back to the 12 commission to certify foreign medical graduates, 13 and that he was still then approved again through 14 the commission and eventually received residency 15 at Howard University.</p> <p>16 Q And what's the basis for that 17 understanding?</p> <p>18 A The court documents that I read from 19 his federal trial.</p> <p>20 Q This is the -- the guilty plea of 21 Dr. Akoda?</p> <p>22 A The transcript of the trial.</p> <p>23 Q Okay. And do you know whether ECFMG 24 certification is sufficient to allow a person to 25 obtain a residency in the United States?</p>	<p style="text-align: right;">Page 84</p> <p>1 Q Okay. We're back on the record. You 2 understand you're still under oath?</p> <p>3 A Yes.</p> <p>4 Q Okay. I need to ask you a couple of 5 questions about some of the statements that are in 6 your discovery responses.</p> <p>7 A Okay.</p> <p>8 Q And one of them asks -- and I know you 9 reviewed these in advance of coming in, and I can 10 show them to you if it would be helpful, but if 11 not, I'll just ask you some of the questions.</p> <p>12 I think you've described here that you 13 feel emotional distress as a result of what you 14 learned about Dr. Akoda; correct?</p> <p>15 A Yes.</p> <p>16 Q Are there any physical conditions that 17 today you attribute to that emotional distress?</p> <p>18 A I had not thought of this until you 19 asked me about the date that my current back pain 20 started which coincides with when I learned about 21 Akoda. And, so, I don't know if they are related 22 or not.</p> <p>23 Q Okay. None of the doctors that you've 24 seen for that have told you that that's likely 25 related to Dr. Akoda; correct?</p>
<p style="text-align: right;">Page 83</p> <p>1 A I don't understand the --</p> <p>2 Q Well, I -- I -- I've heard you say that 3 you blame ECFMG, at least in part, because I think 4 you've called them the first gatekeeper, and I was 5 trying to understand whether you believe that 6 ECFMG certification in and of itself is sufficient 7 to allow a person to be in a residency program.</p> <p>8 A I don't think so. I think that it's 9 required for them to be able to take the medical 10 boards in the first place which is a requirement 11 for a residency program.</p> <p>12 Q And the basis for that understanding 13 is?</p> <p>14 A The documents that I read from the 15 federal trial.</p> <p>16 MR. SHAFFER: Okay. Let's go ahead and 17 mark this. You know what? Off the record a 18 second.</p> <p>19 THE VIDEOGRAPHER: Off the record at 20 3:47.</p> <p>21 (Recess -- 3:47 p.m.) 22 (After recess -- 3:50 p.m.)</p> <p>23 THE VIDEOGRAPHER: Back on the record 24 at 3:50.</p> <p>25 BY MR. SHAFFER:</p>	<p style="text-align: right;">Page 85</p> <p>1 A None of the doctors I've seen of that 2 know about doctor -- know about Akoda.</p> <p>3 Q Okay. Well, Dr. Major did; correct?</p> <p>4 A Yes, but I didn't see Dr. Major for my 5 back pain.</p> <p>6 Q The doctor you saw for back pain was?</p> <p>7 A I saw a physical therapist here, ATI 8 Physical Therapy. And I see a physical therapist 9 in Costa Rica named Eduardo Reyes.</p> <p>10 Q Do you know --</p> <p>11 A And I see a family -- someone my 12 husband has seen for a long time who is a 13 structural integrationist named Priscilla Soto.</p> <p>14 Q Is Priscilla a M.D.?</p> <p>15 A No, none of these are M.D.s.</p> <p>16 Q And your physical therapists were not 17 M.D.s --</p> <p>18 A No.</p> <p>19 Q -- correct?</p> <p>20 Your supplemental answer to 21 interrogatory number 2 we asked said that you are 22 a survivor of previous sexual abuse --</p> <p>23 A Yes.</p> <p>24 Q -- is that correct?</p> <p>25 A Yes.</p>

<p style="text-align: right;">Page 86</p> <p>1 Q When did that occur?</p> <p>2 A I was molested as a child, and I was a</p> <p>3 victim of sexual assault as an adult.</p> <p>4 Q Okay. As an adult what year</p> <p>5 approximately would that have been?</p> <p>6 A On multiple -- twice.</p> <p>7 Q Okay. Did you ever -- I'm sorry to</p> <p>8 hear that.</p> <p>9 Did you ever speak to any of your</p> <p>10 doctors about that experience?</p> <p>11 A No.</p> <p>12 Q Why not?</p> <p>13 A Because it's very difficult to talk</p> <p>14 about.</p> <p>15 Q Okay. And I apologize for having to</p> <p>16 ask you those questions, but it was -- it was in</p> <p>17 your response.</p> <p>18 And I take it -- go ahead.</p> <p>19 A I did -- I would have spoken to a</p> <p>20 doctor. I did not tell the doctor that I was</p> <p>21 sexually assaulted, but I did have a STD check --</p> <p>22 Q Okay.</p> <p>23 A -- afterwards.</p> <p>24 Q And in seeing doctors even before you</p> <p>25 heard about Dr. Akoda in June of 2017, would you</p>	<p style="text-align: right;">Page 88</p> <p>1 A Yes.</p> <p>2 Q Okay. And I also see a reference to</p> <p>3 Traci Gore, R.N.?</p> <p>4 A Okay. Right. Because Dr. Waldrop was</p> <p>5 not at this appointment.</p> <p>6 Q Okay. And do you think Traci Gore was</p> <p>7 the person at this appointment?</p> <p>8 A Yes. I believe she would be a nurse</p> <p>9 midwife.</p> <p>10 Q Okay. It looks like she has R.N. --</p> <p>11 A Okay.</p> <p>12 Q -- so a registered nurse would be</p> <p>13 consistent.</p> <p>14 And I -- again, I'm just trying to make</p> <p>15 sure I understand the facts here. Under sexual</p> <p>16 detail, it says history of sexual abuse, no.</p> <p>17 So I'm wondering -- you said previously</p> <p>18 that if you were asked you would have said</p> <p>19 something, but it looks like here you responded</p> <p>20 no; correct?</p> <p>21 A Or that I wasn't asked. I don't</p> <p>22 remember.</p> <p>23 Q Okay. So you think the reference to</p> <p>24 "no" means that you weren't asked?</p> <p>25 A I would assume that.</p>
<p style="text-align: right;">Page 87</p> <p>1 have mentioned that prior abuse to any of those</p> <p>2 doctors?</p> <p>3 A No, it wouldn't have been as relevant.</p> <p>4 Q Okay. Do you know whether they asked</p> <p>5 those questions when you would go in?</p> <p>6 A I'm sure in some cases and if they had</p> <p>7 asked I would say, but it's not something I would</p> <p>8 bring up as a concern.</p> <p>9 Q Okay.</p> <p>10 (Russell Deposition Exhibit 2 was</p> <p>11 marked for identification and attached to the</p> <p>12 transcript.)</p> <p>13 BY MR. SHAFFER:</p> <p>14 Q I've handed you, Ms. Russell, what</p> <p>15 we've marked as Exhibit 2 which is a report from</p> <p>16 Prince George's Hospital Center. It looks like it</p> <p>17 was May 14th, 2016; correct?</p> <p>18 A Yes.</p> <p>19 Q So that would have been shortly before</p> <p>20 Luka was born?</p> <p>21 A Yes, I think I remember this</p> <p>22 appointment.</p> <p>23 Q Okay. And you're seeing, it looks like</p> <p>24 attending at the bottom it says Dr. Waldrop;</p> <p>25 correct? Do you see that?</p>	<p style="text-align: right;">Page 89</p> <p>1 Q Okay.</p> <p>2 A Because it's not a secret.</p> <p>3 Q Okay. And this appointment would have</p> <p>4 been well before you heard anything about</p> <p>5 Dr. Akoda in 2017; correct?</p> <p>6 A Yes.</p> <p>7 (Russell Deposition Exhibit 3 was</p> <p>8 marked for identification and attached to the</p> <p>9 transcript.)</p> <p>10 BY MR. SHAFFER:</p> <p>11 Q Ms. Russell, I've handed you what's</p> <p>12 been marked as Exhibit 3 which is an obstetrical</p> <p>13 form from the Prince George's Hospital Center.</p> <p>14 Again, this one looks like it references a series</p> <p>15 of medical triage and assessments for May 14th,</p> <p>16 2016.</p> <p>17 Do you see that?</p> <p>18 A Yes.</p> <p>19 Q Okay. Do you know whether this was the</p> <p>20 same appointment that we just looked at or a</p> <p>21 different one?</p> <p>22 A It appears to be since this marks the</p> <p>23 same date and only minutes apart.</p> <p>24 Q And if you turn to the page which has</p> <p>25 the Bates number, which is the big number at the</p>



<p style="text-align: right;">Page 90</p> <p>1 bottom, 1129, at the top it references questions 2 about substance abuse, and the answer is none. 3 Was that accurate from your perspective 4 there; that if you were asked about substance 5 abuse, you would say there was none? 6 A Yes. 7 Q Okay. And then there's a reference to 8 sexual -- a history of sexual abuse, and the 9 answer is, referenced here again, no; correct? 10 A Yes. 11 Q In connection with your discovery 12 responses, you say that your experiences with 13 Dr. Akoda have flowed into your marriage and 14 created intimacy issues; correct? 15 A Yes. 16 Q In what way has that interfered with 17 your marital relationship? 18 A It has been difficult to be sexually 19 intimate, and it's impacted family planning 20 because we want more children, and that is 21 challenging when it is hard to see an OB/GYN. And 22 it's -- intimacy with my husband is better now, 23 but it's -- it's not like it was before. And 24 after I found out about this, it was very 25 difficult.</p>	<p style="text-align: right;">Page 92</p> <p>1 Q And you had mentioned previously that 2 Dr. Major was someone who's been your primary care 3 or was your primary care physician for about ten 4 years up through sometime in 2018? 5 A Yes. 6 Q Okay. I have some questions about this 7 group of -- of records which I'll represent were 8 provided to us by your lawyers. 9 A Uh-huh. 10 Q So the first page which has 118654 at 11 the bottom looks like it references a visit from 12 2015, 10/8/2015? 13 A That's correct. 14 Q And that would have been, looks like, 15 in connection with maybe a pregnancy test related 16 to Luka? 17 A Yes. 18 Q Okay. And then on the second page, you 19 went to see -- when you were in to see Dr. Major, 20 there were reported findings on the visit. I'm 21 looking at the box that says ROS up on the top 22 left-hand side there. 23 A Okay. 24 Q And there's a number of reports, most 25 of -- if not all of them saying no this, no that,</p>
<p style="text-align: right;">Page 91</p> <p>1 Q And have you seen or talked to anyone? 2 I know you mentioned sort of doing yoga in the 3 morning and doing walks, and things like that. 4 Have you spoken with a therapist or 5 anyone in the health care facility, or is this 6 something you've handled on your own? 7 A No, I've not spoken to anybody in the 8 health care industry. Just on my own. 9 Q Okay. 10 A With my husband. 11 Q Okay. Did you see a counselor -- a 12 marriage counselor or it's something you've worked 13 on together? 14 A No, we just work on it together. 15 Q Okay. 16 (Russell Deposition Exhibit 4 was 17 marked for identification and attached to the 18 transcript.) 19 BY MR. SHAFFER: 20 Q Here's more paper for you. 21 Ms. Russell, I've handed you what's 22 been marked as Exhibit 4 which, I think -- and you 23 can tell me if I've got it wrong -- but I think 24 are a series of records from Dr. Major's office. 25 A Yes.</p>	<p style="text-align: right;">Page 93</p> <p>1 no the other thing. 2 And you can look through the whole 3 discussion there, but I wanted to turn your 4 attention to sort of the -- the -- I guess the 5 last three sentences. It states that she -- and 6 this is referring to you -- reports no depression, 7 no sleep disturbances, feeling safe in a 8 relationship, no alcohol abuse, no anxiety, no 9 hallucinations, no sui- -- suicidal thoughts, no 10 fatigue and thereon. 11 Does that all sound consistent with how 12 you were feeling at that point in time? 13 A I don't know when this is from. 14 Q This is still from October of 2015? 15 A Yes. 16 Q Okay. If we keep going, it looks like 17 there is another visit to see Dr. Major, and this 18 page is 118664. 19 Do you see that one? 20 A Yes. 21 Q It looks like that was from May of 22 2017; correct? 23 I'm looking -- 24 A Where -- okay. 25 Q -- under the vitals there in the middle</p>

<p style="text-align: right;">Page 94</p> <p>1 of the page?</p> <p>2 A Yes.</p> <p>3 Q Which is the same place we looked at</p> <p>4 the October date from the last report.</p> <p>5 It says up above under chief complaint,</p> <p>6 patient is here today for physical exam only; had</p> <p>7 blood work; eye exam; swelling lymph nodes; and</p> <p>8 looks like neck mass?</p> <p>9 A Uh-huh.</p> <p>10 Q Do you see that?</p> <p>11 Do you recall why you went to see</p> <p>12 Dr. Major in May of 2017?</p> <p>13 A For this (indicating).</p> <p>14 Q Okay. You can see it a little bit</p> <p>15 there. Still there?</p> <p>16 A Yep, still there.</p> <p>17 Q Okay. As part of your examination with</p> <p>18 Dr. Major in May of 2017, and now I'm turning to</p> <p>19 the page that has 666 at the bottom of it -- it</p> <p>20 might be two pages later. It's got a -- it starts</p> <p>21 at the bottom of 65. It's the ROS section?</p> <p>22 A ROS, okay.</p> <p>23 Q And again, I'm focusing the attention</p> <p>24 on the reports in here that she -- that's</p> <p>25 referring to you -- reports no depression, no</p>	<p style="text-align: right;">Page 96</p> <p>1 A I do not.</p> <p>2 Q Do you know what the muscle spasm since</p> <p>3 pregnancy is that's referenced under the</p> <p>4 complaint?</p> <p>5 A It says since after pregnancy.</p> <p>6 Q Uh-huh.</p> <p>7 A I would think my back because this is</p> <p>8 about when it started. 6/28. June. After my son</p> <p>9 was a year.</p> <p>10 Q Well, this, I guess, would actually be</p> <p>11 two years; right? June of 20 --</p> <p>12 A This is two years, okay.</p> <p>13 Q This would have been last summer, I</p> <p>14 guess, before you --</p> <p>15 A This would have been --</p> <p>16 Q I'm sorry. Go ahead.</p> <p>17 A So this would have been after.</p> <p>18 Q It seems like this would have been</p> <p>19 before you were going to Costa Rica.</p> <p>20 A Yes, yes. So I would have already been</p> <p>21 getting -- having trouble with this for a year.</p> <p>22 Q And that's your --</p> <p>23 A And I wanted to get physical -- I</p> <p>24 wanted to get therapy?</p> <p>25 Q Got it. And that's your testimony;</p>
<p style="text-align: right;">Page 95</p> <p>1 sleep disturbances, feeling safe in a</p> <p>2 relationship, no alcohol abuse, no anxiety, no</p> <p>3 hallucinations and no suicidal thoughts.</p> <p>4 MR. ZAJDEL: Hold on.</p> <p>5 BY MR. SHAFFER:</p> <p>6 Q And my question is the same as I asked</p> <p>7 you on the other report. This would be consistent</p> <p>8 with how you reported to Dr. Major you were</p> <p>9 feeling at that time?</p> <p>10 A Yes.</p> <p>11 Q Okay. If we turn to the next report in</p> <p>12 here which is the page that starts 668 or ends</p> <p>13 with 668. Sorry.</p> <p>14 If you look under the vitals section,</p> <p>15 it looks like this is a report of June 28th, 2018.</p> <p>16 A Uh-huh.</p> <p>17 Q Do you see that?</p> <p>18 A Yes.</p> <p>19 Q Okay. And the chief complaint</p> <p>20 referenced here is a follow-up. Patient complains</p> <p>21 of muscle spasm since pregnancy -- since after</p> <p>22 pregnancy. Also complains of right elbow pain and</p> <p>23 lump on right side of neck.</p> <p>24 Do you recall what led you to go see</p> <p>25 Dr. Major in June of 2018?</p>	<p style="text-align: right;">Page 97</p> <p>1 that you believe it started about a year after</p> <p>2 your -- his pregnancy. That's not reflected in</p> <p>3 this report; right?</p> <p>4 A No.</p> <p>5 MR. ZAJDEL: Objection. I think that</p> <p>6 misstates facts. I just think you misspoke.</p> <p>7 THE WITNESS: Can you restate?</p> <p>8 BY MR. SHAFFER:</p> <p>9 Q I'll ask you the question again just to</p> <p>10 make sure we're clear.</p> <p>11 A Thank you.</p> <p>12 Q You were -- you were saying that -- I</p> <p>13 think you testified here earlier today that the</p> <p>14 back pain that you were experiencing you think</p> <p>15 started about a year after Luka was born; right?</p> <p>16 A Yes.</p> <p>17 Q Okay. And this report doesn't</p> <p>18 reference --</p> <p>19 A It does --</p> <p>20 Q -- Monique has had back pain for the</p> <p>21 past year; it just says muscle spasm since after</p> <p>22 pregnancy. It's not specific as to time.</p> <p>23 A Correct.</p> <p>24 Q Okay. It also makes reference to right</p> <p>25 elbow pain. Do you know what that was?</p>

<p style="text-align: right;">Page 98</p> <p>1 A It was a pain in my right elbow. I 2 don't know why. 3 Q Okay. Do you recall being treated for 4 it? 5 A The pain in my elbow? 6 Q Uh-huh. 7 A Yes. 8 Q Okay. 9 A Dr. Major recommended that I get a 10 brace -- a compression brace. 11 Q Uh-huh. 12 A That helped. 13 Q Okay. Looking again at the report 14 again here from June of 2018, under the ROS 15 section, this is on page 670. 16 It references that you were reporting 17 arthralgias and joint pain. 18 A It was a shooting pain up my legs. 19 Q Okay. And so that was accurate in 20 terms of what was reflected there; correct? 21 A Yes. 22 Q Okay. And then later down in the 23 report there, it states that she -- referring to 24 you -- reports no depression, no sleep 25 disturbances, feeling safe in a relationship, no</p>	<p style="text-align: right;">Page 100</p> <p>1 Okay. And you would have gone to see 2 Dr. -- 3 A Major. 4 Q -- Major for that? 5 A Yes. 6 Q And, again, looking at the report of 7 that visit, if we turn to the page 674, there's 8 the ROS section. Again it reports, No fever, no 9 night sweats, no significant weight gain, no 10 significant weight loss, no exercise intolerance, 11 a bunch of other negative responses. 12 And then it again states, She reports 13 no depression, no sleep disturbances, feeling safe 14 in a relationship, no alcohol abuse, no anxiety, 15 no hallucinations and no suicidal -- suicidal 16 thoughts. 17 Correct? 18 A It also says that I report no GERD, no 19 vomiting blood, no hematuria, which are not things 20 that I would have been asked. 21 Q Okay. So you don't believe you were 22 asked about these things? 23 A I do not believe I was asked about 24 these each visit. 25 Q Okay. You were asked about them at</p>
<p style="text-align: right;">Page 99</p> <p>1 alcohol abuse, no anxiety, no hallucinations, and 2 no suicidal thoughts; correct? 3 A Yes. 4 Q And that's what you would have reported 5 at that time to Dr. Major? 6 A If he asked, then I would. But when I 7 go see a doctor, they don't ask you all of those 8 questions every time. 9 Q Okay. If we turn to page 672 are the 10 last three, this is -- it looks like a visit to 11 see Dr. Major again in July of 2018? 12 A Yes. 13 Q Do you see that? 14 Okay. So that was an additional time 15 you went to see Dr. Major, after the June visit? 16 A Yes. I'm looking to see why. 17 Q Under the chief complaint box on 672, 18 it says, Patient was seen in office today for a 19 physical exam only. 20 A That may have been a requirement for my 21 new job. 22 Q Okay. You had to get a physical exam 23 before you went to -- 24 A Costa Rica. 25 Q -- Costa Rica?</p>	<p style="text-align: right;">Page 101</p> <p>1 some visits? 2 A I don't ever remember being asked if I 3 felt safe in a relationship by any doctor in my 4 entire life. 5 Q Okay. 6 A I've never been asked about many of 7 these things. 8 Q Turn to the report that is 676. Do you 9 see that one? 10 A Uh-huh. 11 Q It looks like that's a visit on 12 July 20th, 2018, again to Dr. Major? 13 A Yes. 14 Q And this one says, Follow-up, 15 injection, lab review and injection, Tetanus shot. 16 Do you have a recollection of why you 17 went to see Dr. Major for this visit? 18 A For my new job in Costa Rica. 19 Q Okay. What -- what do you -- do you 20 recall either based on being refreshed by the 21 report or from your own memory why you went to see 22 Dr. Major on July 20th? 23 A Because I needed a tetanus shot. 24 Q Okay. Is that the only reason for the 25 visit?</p>

<p style="text-align: right;">Page 102</p> <p>1 A I don't know, but I know I did need a 2 tetanus shot for my job, and that's on here. 3 Q If you turn to page 677, which is the 4 second page of that report, if you look under some 5 of the boxes on this page, including family 6 history, social history, surgical history, 7 gynecological history, all of those expressly 8 state that history was not reviewed at this visit; 9 correct? 10 A Where is this? Reviewed, okay. 11 Q Sorry. If you look under problems, it 12 says, Problems not reviewed, last reviewed 13 May 2017. Same thing with family history, social 14 history, surgical history, GYN history, obstetric 15 history. 16 A Yes. 17 Q Okay. On page 8 -- 678 where you've 18 got HPI and ROS and physical exam, none of those 19 states not reviewed; correct? 20 A HPI, ROS, yes. 21 Q Yes. None of those make that same 22 reference? 23 A Correct. 24 Q Okay. 25 A What does ROS stand for?</p>	<p style="text-align: right;">Page 104</p> <p>1 of those things with Dr. Major? 2 A Correct. 3 Q Do you think you discussed back pain 4 with Dr. Major? 5 A Yes. 6 Q Do you think you discussed the 7 location, quality, severity, alleviating factors 8 and aggravating factors with Dr. Major? 9 A Yes, I did. 10 Q Okay. 11 A I do believe I did. I was not asked on 12 every visit that I went to Dr. Major whether or 13 not I was experiencing sinus problems or 14 depression or GERD, and so I doubt that I was 15 asked about all of these things unless I 16 specifically said these are my symptoms. 17 Q Which one of these appointments with 18 Dr. Major did you talk about Dr. Akoda? 19 A I don't know. It would have been -- I 20 don't know. 21 Q Okay. 22 MR. SHAFFER: Let's take another short 23 five-minute break if that's okay. 24 THE VIDEOGRAPHER: Off the record at 25 4:20.</p>
<p style="text-align: right;">Page 103</p> <p>1 Q I guess would be report on symptoms, 2 but I'm not a doctor either, so I tried to answer 3 it to the best of my ability. 4 And if you look under the ROS 5 section -- well, if you look under the HPI 6 section, you see a reference to back pain reported 7 by patient; correct? 8 A Yes. 9 Q And I think you've described that 10 before and said that's accurate. At the time last 11 summer you were feeling back pain; correct? 12 A Yes. 13 Q And under the ROS section you also 14 reported back pain; correct? 15 A Yes, except that it also says no muscle 16 aches which is not -- I could not have back pain 17 without muscle aches, so this doesn't really make 18 sense. 19 Q Okay. And, so, you think again that 20 none of the items that were in the ROS discussion 21 which again here in July of 2018 states that she 22 reports no depression, no sleep disturbances, 23 feeling safe in a relationship, no alcohol abuse, 24 no anxiety, no hallucinations and no suicidal 25 thoughts, you believe that you didn't discuss any</p>	<p style="text-align: right;">Page 105</p> <p>1 (Recess -- 4:20 p.m.) 2 (After recess -- 4:31 p.m.) 3 THE VIDEOGRAPHER: We are back on the 4 record at 4:31. 5 BY MR. SHAFFER: 6 Q Okay. Ms. Russell, we're back on the 7 record. Do you understand you're still under 8 oath? 9 A Yes. 10 Q Great. 11 (Russell Deposition Exhibit 5 was 12 marked for identification and attached to the 13 transcript.) 14 BY MR. SHAFFER: 15 Q I'll hand you what's been marked as 16 Russell 5, which I understand to be a screenshot 17 from your posting in the mommy group that we 18 talked about this morning. 19 A Yes. 20 Q And I guess it's not just a mommy 21 group. It's the MaMa Sisterhood of Prince 22 George's County? 23 A Yes. 24 Q Did you name it that? 25 A I did not. I did not start the group.</p>



<p style="text-align: right;">Page 106</p> <p>1 Q Okay. So this was an existing kind of</p> <p>2 mom's Web site, and you posted this posting --</p> <p>3 A Yes.</p> <p>4 Q -- to that group?</p> <p>5 A Yes.</p> <p>6 Q Did you have to be invited to join that</p> <p>7 group?</p> <p>8 A No, you have to request to join it</p> <p>9 which I would have done probably during my</p> <p>10 pregnancy.</p> <p>11 Q Uh-huh. And -- and, so, you had been a</p> <p>12 part of this group before you posted this?</p> <p>13 A Yes.</p> <p>14 Q Okay. And it looks like you posted</p> <p>15 this around June 27th, 2017; correct?</p> <p>16 A Yes.</p> <p>17 Q Okay. And looking at Russell 5,</p> <p>18 there's some text underneath your name and the --</p> <p>19 the date and time.</p> <p>20 Did you write that?</p> <p>21 A Yes.</p> <p>22 Q Okay. And did anybody help you write</p> <p>23 that or you wrote that yourself?</p> <p>24 A No, I wrote that myself.</p> <p>25 Q Okay. And then you have a link, it</p>	<p style="text-align: right;">Page 108</p> <p>1 Q Understood.</p> <p>2 But it sounds like it's all in one</p> <p>3 place and it's a running list of comments like you</p> <p>4 would see on Facebook --</p> <p>5 A Yes.</p> <p>6 Q -- in response to any post; right?</p> <p>7 A Yes.</p> <p>8 Q And, so, it is possible for somebody to</p> <p>9 take screenshots or send a link or something to be</p> <p>10 able to get those comments; right?</p> <p>11 A It's possible to take screenshots, but</p> <p>12 you wouldn't be able to access a link unless you</p> <p>13 were a member of the group.</p> <p>14 Q Got it.</p> <p>15 But you could do screenshots even if</p> <p>16 you had to piece it together like we did with</p> <p>17 your --</p> <p>18 A Yes.</p> <p>19 Q -- text with Ms. Riggins; right?</p> <p>20 A Yes.</p> <p>21 Q Okay. Is that something that you could</p> <p>22 do if we asked your lawyers for copies of the</p> <p>23 comments that go along with this post? You'd be</p> <p>24 physically able to do it?</p> <p>25 A Yes.</p>
<p style="text-align: right;">Page 107</p> <p>1 looks like, at the bottom of the post to the</p> <p>2 Department of Justice press release for</p> <p>3 Dr. Akoda's guilty plea?</p> <p>4 A Yes.</p> <p>5 Q Okay. What happens in the group once</p> <p>6 you post something like this?</p> <p>7 A People can comment on it.</p> <p>8 Q Okay. Did anyone comment on this?</p> <p>9 A Many people did.</p> <p>10 Q Okay. And can you see -- do the</p> <p>11 comments come back to you?</p> <p>12 A Anyone in the group can see the</p> <p>13 comments.</p> <p>14 Q Okay. And did you get -- you were able</p> <p>15 to look at the comments because you're in the</p> <p>16 group; correct?</p> <p>17 A Yes.</p> <p>18 Q Okay. Do you have access to the</p> <p>19 comments that are associated with this?</p> <p>20 A Yes.</p> <p>21 Q Okay. Did you send those comments to</p> <p>22 Cory or any other of your lawyers?</p> <p>23 A No. They're difficult to -- to</p> <p>24 screenshot like that because it would be a long</p> <p>25 list.</p>	<p style="text-align: right;">Page 109</p> <p>1 MR. SHAFFER: Okay. Counsel, we're</p> <p>2 going to make a request for the complete posting</p> <p>3 and comments that are associated with</p> <p>4 Ms. Russell's posting here that is Russell 5 and</p> <p>5 that she indicated are in response to her posting</p> <p>6 about Dr. Akoda. They're -- they're responsive to</p> <p>7 numerous of our request for production of</p> <p>8 documents, and so we would -- we would ask for</p> <p>9 those as soon as possible and hopefully don't need</p> <p>10 to ask follow-up questions of Ms. Russell about</p> <p>11 those, but at a minimum, we need to see them.</p> <p>12 MR. ZAJDEL: We'll -- we'll look into</p> <p>13 it. I've never tried to produce something like</p> <p>14 that, so we'll see what we can come up with.</p> <p>15 MR. SHAFFER: Great.</p> <p>16 BY MR. SHAFFER:</p> <p>17 Q Is that something that people could</p> <p>18 still post to today? It's like a living post?</p> <p>19 Somebody could add a post today or it closed up at</p> <p>20 some point in time?</p> <p>21 A I don't know if it's still open.</p> <p>22 Q Okay. But you were able to go to this</p> <p>23 either yesterday or over the weekend to be able to</p> <p>24 screenshot this post at least?</p> <p>25 A Yes. You can still find it. I don't</p>

<p style="text-align: right;">Page 110</p> <p>1 know if you can still comment on it or not.</p> <p>2 Q Got it. Okay. All right. Well, we</p> <p>3 made our request and so we'll move on to some</p> <p>4 other questions.</p> <p>5 We talked a little bit earlier about</p> <p>6 the lawsuit that you filed in Maryland. Is that</p> <p>7 case still active today?</p> <p>8 A No, it's not.</p> <p>9 Q Okay. What's your understanding of the</p> <p>10 current status of that case?</p> <p>11 A That it's been dismissed.</p> <p>12 Q Okay. And when did you -- when did you</p> <p>13 find out that it was dismissed?</p> <p>14 A I'm not sure.</p> <p>15 Q Okay. Do you know whether -- well, you</p> <p>16 were consulted before you filed the case; right?</p> <p>17 A Before I filed the case in the first</p> <p>18 place?</p> <p>19 Q Uh-huh.</p> <p>20 A Yes.</p> <p>21 Q Okay. Were you consulted before you</p> <p>22 dismissed the case?</p> <p>23 A Yes.</p> <p>24 Q Okay. What's your understanding of the</p> <p>25 terms on which your case has been dismissed?</p>	<p style="text-align: right;">Page 112</p> <p>1 Q Okay. It is your understanding that in</p> <p>2 addition to being able to pursue the case in the</p> <p>3 future if you want, that you will receive money in</p> <p>4 the future in connection with dismissing the case?</p> <p>5 A No.</p> <p>6 Q Okay. Did you dismiss the case because</p> <p>7 any of the facts that you provided in connection</p> <p>8 with that litigation you believe now are false?</p> <p>9 A No.</p> <p>10 Q Okay. You believe that the answers,</p> <p>11 for example, to interrogatories that you provided</p> <p>12 under oath in that litigation are still true and</p> <p>13 correct to the best of your understanding?</p> <p>14 A To the best of my knowledge.</p> <p>15 Q Okay. And answers that you gave to</p> <p>16 requests for admissions that were asked of you,</p> <p>17 written questions to admit or deny a particular</p> <p>18 fact that you answered in that litigation are</p> <p>19 still true and correct to the best of your</p> <p>20 knowledge?</p> <p>21 A To the best of my knowledge.</p> <p>22 Q Okay. And do you know when the case</p> <p>23 was dismissed?</p> <p>24 A I don't know exactly.</p> <p>25 Q Okay.</p>
<p style="text-align: right;">Page 111</p> <p>1 A That it's not active right now, but I</p> <p>2 intend to pursue it later, and if I want to, then</p> <p>3 I can.</p> <p>4 Q Okay. And what do you mean it's not</p> <p>5 active but you can pursue it later?</p> <p>6 A Like if I want to go back and continue</p> <p>7 to sue the hospital, that I can.</p> <p>8 Q Okay. And did you have any discussions</p> <p>9 with anyone other than your lawyers about</p> <p>10 dismissing that case?</p> <p>11 A No.</p> <p>12 Q Did you receive any money in connection</p> <p>13 with dismissing that case?</p> <p>14 A No.</p> <p>15 Q Did you -- did you consult with members</p> <p>16 of the putative class you were representing in the</p> <p>17 case before you dismissed the case?</p> <p>18 A I acted on advice of my counsel.</p> <p>19 Q But did you speak with any of those</p> <p>20 class members before you dismissed the case?</p> <p>21 A No. The only class member that I've</p> <p>22 spoken to is Jasmine Riggins, and you have the</p> <p>23 conversation that we had.</p> <p>24 Q Okay. And that was in 2017?</p> <p>25 A Yes.</p>	<p style="text-align: right;">Page 113</p> <p>1 (Russell Deposition Exhibit 6 was</p> <p>2 marked for identification and attached to the</p> <p>3 transcript.)</p> <p>4 THE WITNESS: (Reviews document.)</p> <p>5 BY MR. SHAFFER:</p> <p>6 Q Okay. Ms. Russell, I've given you</p> <p>7 what's been marked as Exhibit 6, and it's a</p> <p>8 stipulation of dismissal without prejudice. That</p> <p>9 if you turn to the last page called a certificate</p> <p>10 of service, it says that it was mailed on</p> <p>11 September 3rd, 2019, so about two weeks ago.</p> <p>12 A Okay.</p> <p>13 Q Do you see that?</p> <p>14 A Yeah.</p> <p>15 Q Does that refresh your recollection as</p> <p>16 to when you dismissed your case against Dimensions</p> <p>17 Health Care in Maryland?</p> <p>18 A I guess so, but I'm in Costa Rica, so</p> <p>19 when we discuss things and when things are -- are</p> <p>20 exactly happening or dated, there's -- it's not</p> <p>21 always clear or then they -- we talk and then this</p> <p>22 happens the next day.</p> <p>23 Q Okay. So it would have been sometime</p> <p>24 before September 3rd, but might have been earlier</p> <p>25 than September 2nd?</p>

<p style="text-align: right;">Page 114</p> <p>1 A Yes.</p> <p>2 Q Okay. And have you seen this document</p> <p>3 itself before I showed it to you now?</p> <p>4 A I believe I have it in my email.</p> <p>5 Q Okay. And do you know who Christina</p> <p>6 Dews is?</p> <p>7 A I do not.</p> <p>8 Q Do you know who Latisa Gaymon is?</p> <p>9 A I do not recognize any of the names of</p> <p>10 the other plaintiffs other than Jasmine Riggins.</p> <p>11 Q And you've never spoken with any of</p> <p>12 them?</p> <p>13 A Not to my knowledge.</p> <p>14 Q In the second paragraph of the first</p> <p>15 page, it says that the parties further agree and</p> <p>16 stipulate that the filing of case numbers</p> <p>17 CAL-17-22761, and the other two numbers, the</p> <p>18 earliest of which was filed on September 7, 2017,</p> <p>19 had the effect of tolling any applicable statutes</p> <p>20 of limitations, statutes of repose or other</p> <p>21 time-based defenses on behalf of patients of</p> <p>22 Oluwafemi Charles Igberase, a/k/a Charles Akoda</p> <p>23 during the pendency of this litigation as to</p> <p>24 claims arising out of defendants' credentialing,</p> <p>25 supervising, retaining and employment of Akoda and</p>	<p style="text-align: right;">Page 116</p> <p>1 you filed you made numerous allegations that</p> <p>2 Dimensions had been negligent in doing all those</p> <p>3 things; right?</p> <p>4 A Well, if he used three different Social</p> <p>5 Security numbers and if he were fingerprinted the</p> <p>6 way that I am in -- as a D.C. public school</p> <p>7 teacher, then I would assume that they would be</p> <p>8 able to catch that.</p> <p>9 Q Right. And, again, I think -- I</p> <p>10 think -- I'm just trying to make sure I understand</p> <p>11 it -- your -- your belief was they didn't do that</p> <p>12 and the steps that Dimensions did take were not</p> <p>13 appropriate and, in fact, were below the standard</p> <p>14 that they should have done; correct?</p> <p>15 A I believe that of Dimensions and of the</p> <p>16 commission that certifies foreign medical</p> <p>17 graduates.</p> <p>18 Q And you didn't say the foreign medical</p> <p>19 graduates piece in your Maryland litigation;</p> <p>20 right?</p> <p>21 A I don't know.</p> <p>22 (Russell Deposition Exhibit 7 was</p> <p>23 marked for identification and attached to the</p> <p>24 transcript.)</p> <p>25 BY MR. SHAFFER:</p>
<p style="text-align: right;">Page 115</p> <p>1 those claims set forth in the class action</p> <p>2 complaints.</p> <p>3 Do you see that?</p> <p>4 A Yes.</p> <p>5 Q What does that mean?</p> <p>6 MR. ZAJDEL: Objection: calls for a</p> <p>7 legal conclusion.</p> <p>8 You can answer.</p> <p>9 THE WITNESS: I don't know the</p> <p>10 legalese, but my understanding is that it's</p> <p>11 dismissed, but that I or any of the other class</p> <p>12 members can continue to pursue it at any time.</p> <p>13 BY MR. SHAFFER:</p> <p>14 Q Do you know who Thomas Bojko is?</p> <p>15 A No.</p> <p>16 Q Did you ever see any documents in</p> <p>17 connection with your lawsuit in Maryland against</p> <p>18 Dimensions Health Corp. that related to</p> <p>19 conclusions about whether Dimensions had been</p> <p>20 negligent in its hiring, supervising,</p> <p>21 credentialing, background checks of Dr. Akoda?</p> <p>22 A Did I ever see any documents --</p> <p>23 Q Speaking to that issue.</p> <p>24 A Not to my knowledge.</p> <p>25 Q You're aware that in the complaint that</p>	<p style="text-align: right;">Page 117</p> <p>1 Q Ms. Russell, I've handed you what's</p> <p>2 been marked as Exhibit 7, and these are Plaintiff</p> <p>3 Monique Russell's Responses to Defendants'</p> <p>4 Requests for Admissions in the Dimensions Health</p> <p>5 Corporation lawsuit that you filed in Prince</p> <p>6 George's County, Maryland.</p> <p>7 Do you see that?</p> <p>8 A Yes.</p> <p>9 Q Have you seen this document before?</p> <p>10 A Yes.</p> <p>11 Q And as we were talking before, this is</p> <p>12 one of the sets of discovery or information</p> <p>13 requests that were asked of you by Dimensions'</p> <p>14 lawyers in that case in Maryland; correct?</p> <p>15 A Yes.</p> <p>16 Q And you -- you, under the rules, were</p> <p>17 to provide written admits or denies in response to</p> <p>18 these requests and worked with your lawyers to do</p> <p>19 that; correct?</p> <p>20 A Yes.</p> <p>21 Q And did you, in looking at these, have</p> <p>22 a chance to review these before they were sent to</p> <p>23 the lawyers for Dimensions?</p> <p>24 A Yes.</p> <p>25 Q And when you sent them, were they true</p>

<p style="text-align: right;">Page 118</p> <p>1 and correct to the best of your knowledge?</p> <p>2 A To the best of my knowledge.</p> <p>3 Q Okay. And as you sit here today,</p> <p>4 when's the last time you looked at these?</p> <p>5 A I looked over all of the documents,</p> <p>6 about a hundred pages of documents yesterday.</p> <p>7 Q Okay.</p> <p>8 A And looked through a little bit more</p> <p>9 earlier today.</p> <p>10 Q Okay. Do you know whether this</p> <p>11 particular set of responses was part of that?</p> <p>12 A I believe so, but I'm not sure.</p> <p>13 Q Okay. I want to ask you about a couple</p> <p>14 of them in particular just to make sure that we're</p> <p>15 refreshed and that you're not changing your answer</p> <p>16 on any of these.</p> <p>17 If we look at request number 6, which</p> <p>18 is on the page 790, it asks that you admit at this</p> <p>19 time you are still unaware that the individual</p> <p>20 known to defendants as Akoda had been certified by</p> <p>21 ECFMG to practice medicine, had applied for, was</p> <p>22 accepted and successfully completed an accredited</p> <p>23 residency program through Howard University</p> <p>24 Hospital, was licensed to practice medicine in you</p> <p>25 the state of Maryland, was licensed to practice</p>	<p style="text-align: right;">Page 120</p> <p>1 way through, he faked his way through ECFMG?</p> <p>2 A Right. ECFMG accepted fake documents.</p> <p>3 Q Or that he submitted fake documents to</p> <p>4 ECFMG?</p> <p>5 A Which they accepted.</p> <p>6 Q Request number 9 says, You did not and</p> <p>7 have not specifically verified the facts about the</p> <p>8 qualifications to practice medicine of the</p> <p>9 individual known to defendants at Dr. Akoda, which</p> <p>10 were provided to you as the basis of the events</p> <p>11 giving rise to your claim.</p> <p>12 And you admitted that; correct?</p> <p>13 A Right. I did not call his school to</p> <p>14 verify.</p> <p>15 Q Any of the qualifications of his to</p> <p>16 practice medicine; correct?</p> <p>17 A Any of the qualifications? Such as?</p> <p>18 Q Such as whether he had applied for,</p> <p>19 been accepted to and completed an accredited</p> <p>20 residency program at Howard University Hospital.</p> <p>21 You didn't verify any facts about that?</p> <p>22 A I did look up credentials.</p> <p>23 Q How about specifically with respect to</p> <p>24 his application, acceptance and completion of an</p> <p>25 accredited residency program through Howard</p>
<p style="text-align: right;">Page 119</p> <p>1 medicine in the Commonwealth of Virginia and was</p> <p>2 board certified by the American College of</p> <p>3 Obstetricians and Gynecologists.</p> <p>4 In response you said, Denied that Akoda</p> <p>5 had been certified by ECFMG to practice medicine.</p> <p>6 Do you see that?</p> <p>7 A Uh-huh.</p> <p>8 Q Why did you deny that Akoda had been</p> <p>9 certified by ECFMG to practice medicine?</p> <p>10 A I don't know, and I don't quite</p> <p>11 understand -- you're unaware that this person is</p> <p>12 certified. I don't really understand what request</p> <p>13 number 6 is saying.</p> <p>14 Q Do you see that you denied that Akoda</p> <p>15 had been certified by ECFMG to practice medicine?</p> <p>16 A Yes.</p> <p>17 Q Do you -- so is it your position that</p> <p>18 Dr. Akoda had not been certified by ECFMG to</p> <p>19 practice medicine?</p> <p>20 A No, I believe that he was -- he faked</p> <p>21 his way through certification.</p> <p>22 Q Okay. And that's the reason that you</p> <p>23 denied the request?</p> <p>24 A Yes.</p> <p>25 Q Okay. And when you say he faked his</p>	<p style="text-align: right;">Page 121</p> <p>1 University Hospital?</p> <p>2 A I did not.</p> <p>3 Q How about --</p> <p>4 A I saw that he was board certified.</p> <p>5 Q How about through his licensure to</p> <p>6 practice medicine in the state of Maryland?</p> <p>7 A I did look to see that he was on the</p> <p>8 Web site for licensed doctors.</p> <p>9 Q How about whether he was licensed to</p> <p>10 practice medicine in the Commonwealth of Virginia?</p> <p>11 A No.</p> <p>12 Q And how about if he was board certified</p> <p>13 by the American College of Obstetricians and</p> <p>14 Gynecologists?</p> <p>15 A I saw it, but I did not go to the</p> <p>16 board.</p> <p>17 Q Okay. Request number 12, turning back</p> <p>18 to page 791, says, You claim that you suffer from</p> <p>19 post-traumatic stress disorder as result of</p> <p>20 allegations against defendants.</p> <p>21 And you denied that; correct?</p> <p>22 A Yes.</p> <p>23 Q You're not claiming post-traumatic</p> <p>24 stress disorder?</p> <p>25 A No.</p>



<p style="text-align: right;">Page 122</p> <p>1 Q Request number 18 at the bottom of 792</p> <p>2 says, You do not suffer depression as a result of</p> <p>3 the events giving rise to your claim.</p> <p>4 And you admit that; correct?</p> <p>5 A Correct.</p> <p>6 Q You're not claiming that you suffer</p> <p>7 from depression as a result of the events</p> <p>8 involving Dr. Akoda?</p> <p>9 A No.</p> <p>10 Q And request number 24 -- I'm jumping</p> <p>11 ahead a little bit to try to move this along, 794,</p> <p>12 question number 24, says, You have never been</p> <p>13 formally diagnosed with depression.</p> <p>14 And you admit that; correct?</p> <p>15 A Correct. I did see a doctor after --</p> <p>16 my family doctor after my sister died who</p> <p>17 prescribed antidepressants --</p> <p>18 Q Uh-huh.</p> <p>19 A -- but I was not formally diagnosed.</p> <p>20 Q And since June of 2017, no diagnosis or</p> <p>21 treatment for depression of any kind?</p> <p>22 A No.</p> <p>23 Q On page 795, request 31 says, You claim</p> <p>24 that you suffer from anxiety as a result of your</p> <p>25 allegations against the defendants.</p>	<p style="text-align: right;">Page 124</p> <p>1 Q Is that true today?</p> <p>2 A Since you brought up the timeline of</p> <p>3 when my back pain started, I'm not sure that it's</p> <p>4 true.</p> <p>5 Q Okay. And this is your reference to</p> <p>6 your testimony that about a year after your son</p> <p>7 was born, you started having back pain?</p> <p>8 A Yes.</p> <p>9 Q And request number 40 says, You have</p> <p>10 never been diagnosed with a physical injury</p> <p>11 resulting from your allegations against the</p> <p>12 defendants.</p> <p>13 And that's admitted; correct?</p> <p>14 A Correct.</p> <p>15 Q Is that true today?</p> <p>16 A Again, I don't know if my back pain is</p> <p>17 related to that because of the timeline.</p> <p>18 Q Okay. And no doctor has told you that</p> <p>19 it is related to that --</p> <p>20 A No.</p> <p>21 Q -- correct?</p> <p>22 A But I've not talked to any doctor I've</p> <p>23 seen for my back pain about Akoda.</p> <p>24 Q Other than Dr. Major?</p> <p>25 A Yes, but Dr. Major didn't treat my back</p>
<p style="text-align: right;">Page 123</p> <p>1 A Yes.</p> <p>2 Q And you admit that, so you do say you</p> <p>3 have anxiety from these issues; correct?</p> <p>4 A Yes.</p> <p>5 Q Okay. And 32 says, You claim that</p> <p>6 you're alleged anxiety has affected your</p> <p>7 relationship with your family.</p> <p>8 And you deny that --</p> <p>9 A Yes.</p> <p>10 Q -- correct?</p> <p>11 So you have anxiety, but it's not</p> <p>12 affected your relationship with your family?</p> <p>13 A Correct.</p> <p>14 Q Okay. And 37 on the next page says,</p> <p>15 You have never been formally diagnosed with</p> <p>16 anxiety.</p> <p>17 That's correct?</p> <p>18 A Correct.</p> <p>19 Q And 39 says, You claim that you suffer</p> <p>20 from physical pain as a result of your allegations</p> <p>21 against the defendants.</p> <p>22 And that is denied?</p> <p>23 A That is correct.</p> <p>24 Q Okay.</p> <p>25 A That's what I wrote.</p>	<p style="text-align: right;">Page 125</p> <p>1 pain. He just referred me out to be treated.</p> <p>2 Q Okay. And he did not, in the reports</p> <p>3 that we saw from the summer of 2018, associate</p> <p>4 your back pain with any of the allegations</p> <p>5 regarding Dr. Akoda; correct?</p> <p>6 A The reports that we show don't say</p> <p>7 anything about what he attributes the pain to at</p> <p>8 all.</p> <p>9 Q And they don't make any reference to</p> <p>10 Dr. Akoda?</p> <p>11 A No. Which would not make sense to put</p> <p>12 into a medical report.</p> <p>13 Q Even if the patient had reported that</p> <p>14 was the basis for -- for coming to see the doctor?</p> <p>15 A I didn't go to see the doctor because</p> <p>16 of Akoda. I went to see the doctor because of the</p> <p>17 back pain. Whether or not the stress from</p> <p>18 discovering that my doc -- my baby was delivered</p> <p>19 by a fake doctor contributed to my back pain, I</p> <p>20 didn't know at the time. I still don't know. And</p> <p>21 Dr. Major wouldn't have had any reason to write</p> <p>22 that in the report.</p> <p>23 Q And who did he refer you out to?</p> <p>24 A To ATI Physical Therapy.</p> <p>25 Q Okay. And has ATI Physical Therapy</p>

<p style="text-align: right;">Page 126</p> <p>1 attributed your back pain to issues with 2 Dr. Akoda? 3 A They don't know anything about issues 4 with Dr. Akoda. 5 Q And so the answer is, no, they have 6 not; correct? 7 A That is correct. 8 Q Looking at paragraph 45 on page 797, 9 that says that you claim that you suffer 10 difficulty sleeping as a result of your 11 allegations against the defendants. 12 And that's denied; correct? 13 A Yes. 14 Q So you are not claiming that you suffer 15 difficulty sleeping as a result of the 16 allegations? 17 A No, I'm not. 18 Q Okay. In request number 47, you were 19 asked whether you suffer from permanent disability 20 as a result of the care you received from 21 Dr. Akoda, and you said that emotional -- 22 plaintiff's emotional injuries are permanent; 23 correct? 24 A Correct. 25 Q You admit that the last time you saw</p>	<p style="text-align: right;">Page 128</p> <p>1 Q Request number 53 at the bottom of 798 2 says, You have not done any independent research 3 to determine the status of ECFMG certification, 4 residency program completion, licensure or board 5 certification for the individual known to 6 defendants as Akoda. 7 And you admitted that; correct? 8 A Yes. 9 Q Is that true today? 10 A Correct. I've been notified, but I 11 haven't done any research to find these things. 12 Q What do you mean you've been notified? 13 A Like I was notified that -- after he 14 was kicked out of the residency program in New 15 Jersey, that they reported it to ECFMG, but that's 16 all. 17 Q And how were you notified of that? 18 A In the legal documents. 19 Q This is the transcript of the federal 20 court trial or something else? 21 A No. I'm not sure. 22 Q Okay. Do you believe the competency to 23 practice medicine includes honesty and 24 truthfulness? 25 A Yes, I do.</p>
<p style="text-align: right;">Page 127</p> <p>1 Dr. Akoda was on or about May 28th, 2016; correct? 2 A Correct. 3 Q Is that accurate? 4 A That would have been when I was 5 discharged from the hospital. 6 Q Paragraph 49 -- request 49, sorry, it 7 says, you claim your alleged permanent disability 8 has affected your relationship with your family. 9 And you denied that; correct? 10 A Correct. 11 Q So your emotional injuries you denied 12 have an affect on your relationship with your 13 family? 14 A Correct. 15 Q Is that true today? 16 A They had relationship on our sex life 17 but not our relationship. 18 Q And request number 50 is that you have 19 never been diagnosed with a permanent disability; 20 correct? 21 A Correct. 22 Q And that is accurate today? 23 A Yes. 24 Q Okay. 25 A My ears just popped. Finally.</p>	<p style="text-align: right;">Page 129</p> <p>1 Q And as to what -- and do you believe 2 that a physician who lies about anything is not 3 competent to treat patients? 4 A No, but I believe that a physician who 5 lies about his credentials is not competent to 6 practice medicine. 7 Q Okay. Have you ever reported any 8 concerns about Dr. Akoda's competency to practice 9 medicine to any law enforcement or hospital 10 personnel at any time? 11 A No. At the time that I discovered, 12 Dr. Akoda was in -- awaiting sentencing for fraud. 13 Q Okay. Do you know what he's doing 14 today? 15 A I do not. 16 Q Jumping ahead to page 807 and request 17 number 99, it says, You do not claim that you were 18 abused sexually by Dr. Akoda; correct? 19 A That is correct. 20 Q And you admitted -- your answer is an 21 admittance so you're not claiming that; correct? 22 A I'm not claiming that. 23 Q And request number 101 says, During 24 your visits with Dr. Akoda you never felt as if 25 you were being abused sexually.</p>

<p style="text-align: right;">Page 130</p> <p>1 And you admit that; correct?</p> <p>2 A I do.</p> <p>3 Q So you did not feel that during your</p> <p>4 visits with Dr. Akoda that you were being abused</p> <p>5 sexually?</p> <p>6 A At the time I did not feel that way.</p> <p>7 Q Do you believe -- do you feel that way</p> <p>8 now?</p> <p>9 A I feel violated for a fake doctor to be</p> <p>10 in my vagina, yes. I feel like I'm a victim of</p> <p>11 sexual assault now.</p> <p>12 Q Have you reported that to the</p> <p>13 authorities?</p> <p>14 A No, that's why I'm doing a class action</p> <p>15 lawsuit so that every woman who he has ever seen</p> <p>16 can be notified.</p> <p>17 Q Do you know whether any of them have</p> <p>18 been notified?</p> <p>19 A I'm sure some have because there have</p> <p>20 been ads, I understand. I posted where I could</p> <p>21 notify women. So I know that some have. I don't</p> <p>22 know how many women there are over the close to</p> <p>23 ten years that he's been doing this who would</p> <p>24 still need to be notified.</p> <p>25 MR. SHAFFER: Let's go off the record</p>	<p style="text-align: right;">Page 132</p> <p>1 Are you aware of that?</p> <p>2 A Yes.</p> <p>3 Q And is it fair to say that having</p> <p>4 reviewed those documents that your experience with</p> <p>5 Dr. Akoda is your personal experience; it's</p> <p>6 certainly not the same as anyone else's; right?</p> <p>7 A I would believe that many of the women</p> <p>8 have different experiences.</p> <p>9 Q And -- and you haven't talked to any of</p> <p>10 them other than what we've talked about with</p> <p>11 Ms. Riggins to know exactly how different or</p> <p>12 varied they may be; correct?</p> <p>13 A Right. And I have not talked to</p> <p>14 Ms. Riggins about the details of her experience.</p> <p>15 Q Apart from the comment section of that</p> <p>16 Facebook mommy group post, have you posted any</p> <p>17 other information about Dr. Akoda anywhere on the</p> <p>18 Internet, Twitter or Instagram or other apps?</p> <p>19 A Not on any other social media or sites,</p> <p>20 and I don't think on any other groups because I</p> <p>21 think that is the only group that would be</p> <p>22 relevant.</p> <p>23 Q And when are you returning to Costa</p> <p>24 Rica?</p> <p>25 A On Wednesday.</p>
<p style="text-align: right;">Page 131</p> <p>1 for a second.</p> <p>2 THE VIDEOGRAPHER: Off the record at</p> <p>3 5:03.</p> <p>4 (Recess -- 5:03 p.m.)</p> <p>5 (After recess -- 5:06 p.m.)</p> <p>6 THE VIDEOGRAPHER: Back on the record</p> <p>7 at 5:06.</p> <p>8 BY MR. SHAFFER:</p> <p>9 Q Ms. Russell, we're back on the record.</p> <p>10 You understand you're still under oath?</p> <p>11 A Yes.</p> <p>12 Q Okay. Apart from the answers you've</p> <p>13 given me today, and I appreciate your willingness</p> <p>14 to talk about some of those things, are there any</p> <p>15 other emotional experiences or conditions or</p> <p>16 impacts from Dr. Akoda that we haven't talked</p> <p>17 about already that you believe you're experiencing</p> <p>18 from having found out about his guilty plea in</p> <p>19 2017?</p> <p>20 A I believe we've covered everything.</p> <p>21 Q In some of the all- -- in some of the</p> <p>22 pleadings that you filed whether in Maryland or</p> <p>23 Pennsylvania related to the Dr. Akoda situation,</p> <p>24 you've made references to the circumstances of</p> <p>25 other women who were treated by Dr. Akoda.</p>	<p style="text-align: right;">Page 133</p> <p>1 Q And have you decided what your plans</p> <p>2 are at the end of your contract year this year?</p> <p>3 A We have not. My husband and I are</p> <p>4 still discussing.</p> <p>5 MR. SHAFFER: I thank you for your time</p> <p>6 this afternoon. I appreciate you coming. I don't</p> <p>7 have any questions. We obviously reserve the</p> <p>8 right to have to ask additional questions related</p> <p>9 to the documents we don't have, but I appreciate</p> <p>10 the time in answering our questions.</p> <p>11 MR. ZAJDEL: I'm going to -- I'm going</p> <p>12 to ask, if you don't mind.</p> <p>13 MR. SHAFFER: Yeah.</p> <p>14 EXAMINATION BY COUNSEL FOR THE PLAINTIFFS</p> <p>15 BY MR. ZAJDEL:</p> <p>16 Q Do you -- is it your belief that Akoda</p> <p>17 should have touched any of the women who you are</p> <p>18 trying to represent in this case?</p> <p>19 A Absolutely not. If I had known what I</p> <p>20 know about him now, I would have never allowed him</p> <p>21 to touch me.</p> <p>22 MR. ZAJDEL: That's all I have.</p> <p>23 MR. SHAFFER: Nothing further at this</p> <p>24 time.</p> <p>25 MR. ZAJDEL: Okay.</p>

Monique Russell

<p style="text-align: right;">Page 134</p> <p>1 THE VIDEOGRAPHER: All right. That is</p> <p>2 everything. We are off the record at -- on</p> <p>3 September 16th, 2019, at 5:10 p.m.</p> <p>4</p> <p>5</p> <p>6</p> <p>7 (Signature having not been waived, the</p> <p>8 Videotaped Deposition of MONIQUE RUSSELL ended at</p> <p>9 5:10 p.m.)</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 136</p> <p>1 ACKNOWLEDGMENT OF DEPONENT</p> <p>2 I, Monique Russell, do hereby</p> <p>3 acknowledge that I have read and examined the</p> <p>4 foregoing testimony, and the same is a true,</p> <p>5 correct and complete transcription of the</p> <p>6 testimony given by me and any corrections appear</p> <p>7 on the attached Errata sheet signed by me.</p> <p>8</p> <p>9</p> <p>10</p> <p>11 _____</p> <p>12 (DATE) (SIGNATURE)</p> <p>13</p> <p>14</p> <p>15 CERTIFICATE OF NOTARY PUBLIC</p> <p>16 Sworn and subscribed to before me this</p> <p>17 _____ day of _____, _____</p> <p>18</p> <p>19</p> <p>20 _____</p> <p>21 NOTARY PUBLIC MY COMMISSION EXPIRES</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
<p style="text-align: right;">Page 135</p> <p>1 CERTIFICATE OF SHORTHAND REPORTER - NOTARY PUBLIC</p> <p>2 I, Dana C. Ryan, Registered Professional</p> <p>3 Reporter, Certified Realtime Reporter, the officer</p> <p>4 before whom the foregoing proceedings were taken</p> <p>5 do hereby certify that the foregoing transcript is</p> <p>6 a true and correct record to the best of my</p> <p>7 ability of the proceedings; that said proceedings</p> <p>8 were taken by me stenographically and thereafter</p> <p>9 reduced to typewriting under my supervision; and</p> <p>10 that I am neither counsel for, related to, nor</p> <p>11 employed by any of the parties to this case and</p> <p>12 have no interest, financial or otherwise, in its</p> <p>13 outcome.</p> <p>14 IN WITNESS WHEREOF, I have hereunto set</p> <p>15 my hand and affixed my notarial seal this 26th day</p> <p>16 of September 2019.</p> <p>17 My Commission expires:</p> <p>18 July 15, 2020</p> <p>19</p> <p>20</p> <p>21</p> <p>22 _____</p> <p>23 NOTARY PUBLIC IN AND FOR THE</p> <p>24 DISTRICT OF COLUMBIA</p> <p>25</p>	